

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

UNDER SEAL

v.

CRIMINAL COMPLAINT

VICTOR THOMPSON, aka "Vic," aka "Old Man"
and the defendants on the attached list**CASE NUMBER:**

(Name and Address of Defendant)

I, Fernando Cervantes, being duly sworn state the following is true and correct to the best of my knowledge and belief. Starting no later than in or around 2004, and continuing until the present, at Chicago, in Cook County, in the Northern District of Illinois defendant(s) did, (Track Statutory Language of Offense)

conspire with each other to knowingly and intentionally distribute and possess with intent to distribute a controlled substance, namely, in excess of 50 grams of mixtures containing cocaine base in the form of crack cocaine ("crack cocaine"), in violation of Title 21, United States Code Section 841(a),

in violation of Title 21 United States Code, Section(s) 846.

I further state that I am a(n) Special Agent, DEA and that this complaint is based on the following facts:
Official Title

See Attached Affidavit

Continued on the attached sheet and made a part hereof: X Yes No

Signature of Complainant

Sworn to before me and subscribed in my presence,

May 1, 2007
Date

at

Chicago, Illinois
City and StateHon. Martin C. Ashman, U.S. Magistrate Judge
Name & Title of Judicial Officer_____
Signature of Judicial Officer

Under Seal

AFFIDAVIT

I, Fernando Cervantes, having been duly sworn on oath, state as follows:

1. I am employed as a Special Agent of the United States Department of Justice, Drug Enforcement Administration (DEA), and have been so employed since 2004. I am currently assigned to the Chicago Division of the DEA and work on a High Intensity Drug Trafficking Area (HIDTA) group tasked to investigate street gangs and other criminal enterprises in and around Chicago. As a Special Agent, I have participated in investigations related to the illegal distribution of controlled substances and other violations of the narcotics laws of the United States. I have received special training in the enforcement of laws concerning controlled substances, and I have been involved in various types of electronic surveillance and the debriefing of defendants, witnesses, informants, gang members, and others who have knowledge of the illegal distribution and transportation of controlled substances.

2. DEA has participated in the investigation of this matter since approximately 2004. Also participating in the investigation have been officers of the Chicago Police Department (CPD). The information contained in this affidavit has been obtained from numerous surveillances, interviews of cooperating witnesses, reviews of consensually-recorded conversations, conversations recorded pursuant to court-authorized wire interceptions (Title III), data gathered pursuant to phone records and court-authorized pen registers and trap-and-traces, interviews of other law enforcement officers and/or reviews of their reports, and reviews of witness statements and lab reports, among other things. This affidavit is being submitted for the limited purpose of establishing probable cause to support a criminal complaint charging the 8 individuals identified below. Accordingly, I have not included each and every fact known to me concerning this investigation.

3. There is probable cause to believe that from at least 2004 to the present, VICTOR THOMPSON, SHAWN DENTON, DARRYL EDWARDS, HERBERT TAYLOR, ONDRAY MCKNIGHT, ANDRE SPARKMAN, CAROLINE SPARKMAN, and MILLARD MORROW conspired with each other, and with others known and unknown, to knowingly and intentionally distribute and possess with intent to distribute a controlled substance, namely, in excess of 50 grams of mixtures containing cocaine base in the form of crack cocaine (“crack cocaine”), in violation of Title 21, United States Code, Section 846.

4. The following is a summary of the paragraphs of this affidavit that refer to each of the above-named individuals:

1. VICTOR THOMPSON, aka “VIC,” “OLD MAN” : 3, 5, 6, 7, 8, 13, 14, 15, 16, 17, 18, 22, 25, 30, 31, 34, 35, 36, 37, 44, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 85, 92-97, 100, 103-104, 109-110, 111-112, 114, 115, 116-117, 125, 132, 139-142, 145-146, 147, 148-149, 152-153, 156-157

2. SHAWN DENTON: 3, 6, 7, 8, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 86, 87, 88, 89, 90, 91, 92-97, 98-99, 101-104, 105-106, 107-108, 109, 111-112, 114, 115, 116-117, 118-119, 121-124, 125, 126-129, 130-131, 133-141, 143-145, 147-152, 154-157, 160-165

3. HERBERT TAYLOR, aka “HERB,” “HEARD,” “GIGGA MAN”: 3, 8, 25, 32, 33, 34, 35, 36, 37, 79, 80, 81, 82, 85, 86, 87, 88, 89, 90, 91, 98-99

4. ONDRAY MCKNIGHT, aka “TRICKY,” “CASH”: 3, 8, 75, 76, 98-99, 100, 101-104, 105-106, 107-108, 109-110, 111-112, 125, 141-142, 150-51

5. DARRYL EDWARDS, aka "TOP FLITE," "FLITE": 3, 8, 19, 66, 67, 68, 69, 74, 113, 114, 115, 116-117, 120, 121-124, 125, 126-129, 130-131, 159

6. ANDRE SPARKMAN, aka "DRE": 3, 8, 19, 55, 56, 83, 84, 105-106, 109-110, 111-112, 130-131, 132, 133-146, 147, 154-155, 160-161

7. CAROLINE SPARKMAN, aka "DINA": 3, 8, 52, 107-108, 147-157

8. MILLARD MORROW, aka "MILLIE": 3, 8, 19, 158-165

I. OVERVIEW OF THE INVESTIGATION

5. As outlined more fully below, the DEA and CPD have obtained information from a variety of sources that VICTOR THOMPSON is a high-ranking member of the GANGSTER DISCIPLES street gang in Chicago, Illinois, and has been for some time. THOMPSON has been reported to be a Board Member in the gang hierarchy, and is believed to control a portion of the narcotics activities for the GANGSTER DISCIPLES in Chicago. This investigation has focused on a crack cocaine trafficking organization headed by VICTOR THOMPSON that operates on the south side, near the area of 116th and Stewart streets, and elsewhere.

6. As part of this investigation, DEA and CPD have conducted numerous surveillances, approximately 30 controlled purchases of crack cocaine from members of the THOMPSON organization (through the use of a cooperating source and undercover CPD officers posing as narcotics purchasers), and numerous consensually recorded conversations. The investigation has also involved court-authorized interceptions over cellular telephones used by VICTOR THOMPSON and SHAWN DENTON. Specifically, on September 12, 2006 Chief Judge James F. Holderman issued an order authorizing the thirty-day interception of wire communications over DENTON's phone, Target Phone 1. On October 17, 2006 Chief Judge Holderman issued an order authorizing a second thirty-day interception of wire communications over DENTON's phone (Target

Phone 1), as well as an initial thirty-day period of interception of VICTOR THOMPSON's phone, Target Phone 3. The investigation has revealed that VICTOR THOMPSON is the leader of this organization and that THOMPSON's "god son," SHAWN DENTON, oversees other co-conspirators who assist in selling crack cocaine in and around 116th and Stewart. THOMPSON and DENTON's co-conspirators include fellow GANGSTER DISCIPLES as well as non-gang members.

7. Conversations intercepted over DENTON and THOMPSON's telephones show DENTON and THOMPSON to be high volume crack cocaine traffickers. Many of these conversations related to the distribution of crack cocaine, as well as the collection, counting, and storage of drugs and money. Many of these conversations also discussed the use and attempted use of violence.

8. THOMPSON and DENTON'S fellow co-conspirators take on various roles in order to assist them. For example, THOMPSON and DENTON'S fellow co-conspirators supply them with cocaine, serve as lookouts for police, direct them to various customers, store cocaine, sell crack cocaine, and make crack cocaine. HERBERT TAYLOR and ONDRAY MCKNIGHT supply cocaine to the organization. In addition, TAYLOR has been intercepted conspiring with DENTON and THOMPSON to rob individuals of drugs and/or money, while MCKNIGHT also sells crack for the organization. DARRYL EDWARDS, ANDRE SPARKMAN, and MILLARD MORROW sell crack cocaine for the organization, and undercover officers have made buys from all three. CAROLINE SPARKMAN serves as a lookout for the organization and stores drugs for the group at her home.

II. BACKGROUND OF THE GANGSTER DISCIPLES

9. I am familiar with the GANGSTER DISCIPLES (GD's) street gang from my training and experience as a DEA agent, from speaking with cooperating sources and defendants, from speaking with other agents and Chicago Police Officers who specialize in investigating the gang, and from

studying materials about the gang, such as the Chicago Crime Commission's 2006 Gang Book entitled "A Detailed Overview of Street Gangs in the Chicago Metropolitan Area."¹ Based on these sources, I am aware that the GD's have existed in Chicago since the 1960's.

10. Today the GD's are considered the largest street gang in Chicago. A Chicago Police Department database has identified at least 7,300 members locally, and some estimates run as high as 30,000.² The gang typically operates through the existence of smaller factions (at least 36 GD factions have been identified in Chicago). Most factions operate in a large portion of the south side of Chicago, but also in many suburban areas, as well as in an estimated 30 states across the country.

11. In the 1980's and part of the 1990's the GD's were run by Larry Hoover, who held the position of Chairman of the Board within the GD's. In 1995 Hoover and nearly 40 others, including many of the top GD leadership, were indicted in the U.S. District Court for the Northern District of Illinois and charged with a variety of offenses, including conspiracy to distribute controlled substances. *See United States v. Larry Hoover et al.*, 95 CR 508 (N.D. Ill.). Hoover and several others were convicted and sentenced to life imprisonment.

12. Under Hoover, the top leadership position below Chairman was "Board Member." Below Board Members were "Governors," who traditionally ran designated portions of Chicago or its suburbs for a particular Board Member. Some high-ranking leaders were also called "Overseers," which was a position usually given to a more senior GD leader who had responsibilities similar to a Governor or higher, but who was not a Board Member. Below the Governor there were sometimes

¹ The Crime Commission gathered material for its book following input from federal and state law enforcement agencies, prosecutors' offices, the Illinois Department of Corrections, and other sources, such as the Sociology Department of the University of Chicago.

² CPD gathers the information that is inputted into its database from admissions made by arrestees about their gang membership, as well as from gang tattoos such arrestees may sport.

“Assistant Governors.” Apart from the Assistant Governor, the Governor’s subordinates were called “Regents,” and they traditionally controlled smaller parts of the Governor’s territory and reported to the Governor. Below the “Regent” were positions that included “Assistant Regent,” “Coordinator,” “Assistant Coordinator,” and “Chief of Security.” Rank and file members were called foot soldiers.

13. A document recovered during the search of a GD-linked organization in 1995 and introduced at Hoover’s trial set out the entire hierarchy of the GD organization at the time. “VIC” (VICTOR THOMPSON) was listed as a Regent for the area between 95th and 107th streets and Vincennes and Eggleston Streets. His “count” (the number of members he controlled) was listed as 200.

III. COOPERATING SOURCES AND CONTROLLED BUYS

14. Some of the information in this affidavit has been provided by cooperating sources (CS’s) in the investigation. In addition, Bernard Ellis, a GD and defendant in *USA v. Bernard Ellis*, 05 CR 756 (N.D. Ill.), currently pending before the Hon. Wayne R. Andersen, provided information to ATF agents about VICTOR THOMPSON that was, unbeknownst to him at the time, captured on a body-recording device worn by the ATF agent investigating him.³

A. Bernard Ellis

15. On August 5, 2005, an ATF agent wearing a body-recording device had a recorded conversation with Bernard Ellis. In this recording, Ellis, a GD, was captured discussing that he worked with VICTOR THOMPSON’S drug trafficking organization. Ellis also discussed the

³ Ellis is charged with being an armed career criminal and a felon in possession of firearms, in violation of Title 18, U.S.C. § § 924(e) and 922(g).

structure of the GD's, and noted that THOMPSON "got the city ... the whole city," meaning controlled drug trafficking for the GD's in the city of Chicago. Ellis went on to explain that THOMPSON's house at 400 West 117th Street was "headquarters for the whole hundreds, starting from 95th." ⁴ Ellis further described how THOMPSON regularly extorted local drug dealers by charging them what Ellis described were "street taxes," that is, a fee to deal drugs in the area. For instance, Ellis described having a conversation with a local drug dealer in which the local dealer complained to him that "VIC say I gotta give him a thousand dollars every week." If drug dealers protested the "street tax," Ellis noted, they were threatened with violence: "Get your shit on. But we got some shit. And you, you can put on the vest, and we got shit go right through that shit. We got them armor-pierce bullets. We got all that shit ... and when you comin' like that, they ain't ... gonna fuck with you." As Ellis explained, "when we come to holler, it's time to pay the piper."

16. Ellis further discussed a system of informants that THOMPSON had in place throughout the city to report how much local drug dealers were making through drug sales ("We got peoples all over the city ... that call us and tell us. We got people rat up on 'em that work for 'em.")). When asked by the ATF agent how the extortion scheme was enforced, Ellis described that it was enforced through torture: "You gotta give that up. Or you go in the trunk, ya tie him to a post, pull his pants down, heat that hanger, and slide it up his ass. He gonn' tell you where that money at."

B. Cooperating Source

17. A Cooperating Source (CS) ⁵ has related that VICTOR THOMPSON is a ranking member

⁴ A search warrant for the 400 W. 117th Street address is being sought in connection with this criminal complaint. Surveillances of THOMPSON at this location are included in the affidavit accompanying the search warrant application.

⁵ CS has been arrested for manufacturing counterfeit United States Currency, identity theft, and domestic battery, and has a conviction for identity theft. CS is cooperating with law enforcement in the hopes of receiving a reduced sentence on a federal counterfeiting charge for which he was arrested in 2006. The complaint against CS has been

of the GD's, and specifically, a Board Member. CS used to be a GD, grew up in THOMPSON's neighborhood, and has known THOMPSON since CS was a teenager. CS related that he has known THOMPSON to have been a drug dealer for about 12 years. CS has reported that from what he has seen and from conversations he had with THOMPSON, CS3 knows THOMPSON to sell "rocks and blows," meaning crack cocaine and heroin. CS, who is cooperating in an effort to receive a reduced sentence on a federal counterfeiting charge, has reported providing THOMPSON with approximately 1 million dollars in counterfeit U.S. currency during the time period of approximately 2005-2006. CS further reported that THOMPSON paid CS approximately \$100,000 for the counterfeit currency, and also offered to pay CS in crack cocaine.

18. CS has explained that THOMPSON sells drugs out of the house at 117th and Stewart, in Chicago, which CS believed to be THOMPSON's mother's house. CS reported that he has been in this house many times when THOMPSON, DENTON, and others were handling and selling drugs there, and has seen THOMPSON instruct DENTON "serve" people at the home, meaning sell them drugs. CS explained that THOMPSON typically keeps a group of look-outs posted up and down the block at and around this location to watch for police, and further explained that THOMPSON and his associates had an elaborate set of signals in place to communicate with each other about their

dismissed in light of his current cooperation, but no promises have been made to him about whether or not charges against him will be reinstated. CS's information has proven reliable in that it has been corroborated by other information provided by CSs in this case, as well as by surveillances, telephone records, and controlled buys. CS was intercepted during the wiretaps in this case talking with SHAWN DENTON over Target Phone 1. CS later informed agents and officers about some of his conversations with SHAWN DENTON and stated that he had met with VICTOR THOMPSON without informing agents and officers. For example, CS described a time when he and THOMPSON went to a shoe store and bought gym-shoes, but did not inform agents about a conversation in which he discussed possibly providing DENTON with stolen electronics. CS also informed agents, and agents overheard on the wiretaps, that THOMPSON asked CS to obtain a "knock out" drug for THOMPSON, that is, a drug that could "knock out" people. CS's significant other was a nurse, and THOMPSON believed that the nurse had access to such drugs through her job. CS told agents he did not intend to give THOMPSON such a drug.

drug trafficking operation. CS has reported that THOMPSON's "god son" SEAN DENTON, whom CS is close to, runs THOMPSON's drug spot at 117th and Stewart for him.

IV. CONTROLLED PURCHASES

19. During this investigation, approximately 30 controlled purchases of crack cocaine occurred.

The following is a brief summary of the purchases:

<u>Date</u>	<u>Location</u>	<u>Crack Cocaine</u>	<u>Seller</u>	<u>Buyer</u>
5-18-06	11550 S. Stewart	0.12 grams	Individual A	UCO
5-25-06	408 W. 116 St	0.59 grams	DARRYL EDWARDS	UCO
5-27-06	408 W. 116 St	0.28 grams	DARRYL EDWARDS	UCO
6-14-06	408 W. 116 St	0.16 grams	MILLARD MORROW	UCO
6-27-06	443 W. 116 St	0.57 grams	DARRYL EDWARDS	UCO
6-30-06	408 W. 116 St	0.25 grams	DARRYL EDWARDS	UCO
7-13-06	411 W. 116 St	0.16 grams	MILLARD MORROW	UCO
			SHAWN DENTON	
7-19-06	353 W. 117 St	0.86 grams	SHAWN DENTON	UCO
7-22-06	415 W. 116 St	1.7 grams	SHAWN DENTON	UCO
7-28-06	415 W. 116 St	1.2 grams	SHAWN DENTON	UCO
8-03-06	415 W. 116 St	1.9 grams	SHAWN DENTON	UCO
8-16-06	11528 S. Stewart	2.0 grams	SHAWN DENTON	UCO
9-20-06	415 W. 116 St	2.2 grams	SHAWN DENTON	UCO
9-28-06	11512 S. Eggleston	4.2 grams	SHAWN DENTON	UCO
9-28-06	11812 S. Eggleston	0.97 grams	DARRYL EDWARDS	UCO
10-04-06	11630 S. Normal	0.40 grams	DARRYL EDWARDS	UCO

10-06-06	11701 S. Eggleston	5.1 grams	SHAWN DENTON	UCO
10-06-06	11630 S. Normal	4.7 grams	DARRYL EDWARDS	UCO
10-07-06	11630 S. Normal	0.37 grams	DARRYL EDWARDS	UCO
10-19-06	400 W. 117 St	3.6 grams	SHAWN DENTON	UCO
10-19-06	407 W. 116 St	1.7 grams	ANDRE SPARKMAN	UCO
10-26-06	415 W. 116 St	1.4 grams	SHAWN DENTON	UCO
10-26-06	415 W. 116 St	4.2 grams	ANDRE SPARKMAN	UCO
			SHAWN DENTON	
10-28-06	415 W. 116 St	8.2 grams	SHAWN DENTON	UCO
11-01-06	415 W. 116 St	5.1 grams	SHAWN DENTON	UCO
11-08-06	414 W. 116 St	8.6 grams	SHAWN DENTON	UCO
			ANDRE SPARKMAN	
11-09-06	411 W. 116 St	7.2 grams	SHAWN DENTON	UCO
11-15-06	415 W. 116 St	4.6 grams	SHAWN DENTON	UCO
11-28-06	400 W. 117 St	6.8 grams	SHAWN DENTON	CS
12-19-06	11400 S. Halsted	62.6 grams	SHAWN DENTON	CS

A. CS's November 28, 2006 Controlled Purchase of Crack Cocaine From SHAWN DENTON

20. On November 28, 2006, CS conducted a controlled purchase of approximately 6.8 grams of crack cocaine from DENTON. The buy was preceded by a series of approximately 5 consensually-recorded phone calls between November 15 and November 28, 2006. During the first call on November 15, 2006, CS called DENTON over Target Phone 1 and asked to buy “two and a half,”

referring to two-and-a-half ounces of crack cocaine, purportedly on behalf of CS's father.⁶ DENTON asked, "How he want it, hard or soft?" "Hard," responded CS, to which DENTON replied, "I got you." On November 28, 2006, CS again spoke to DENTON over Target Phone 1 about the deal. CS told DENTON he was on his way to "grab the bread," meaning the money for the drug deal. DENTON told CS to "hit [his] phone back" when CS was ready.

21. On November 28, 2006, prior to the deal, agents searched CS and his car for the presence of cash or illegal contraband, with negative results, and provided CS with \$1800 in buy money. Agents also outfitted CS with a body-recording device and transmitter. Surveillance then followed CS as he drove to the area of 116th and Stewart. Once there, surveillance overheard (but did not observe) DENTON and CS meet briefly in CS's car, where DENTON informed CS he only had "eight balls on hand," meaning one-eighth ounce amounts. The two then arranged to meet later that day.

22. Later that day, surveillance observed CS and DENTON meet briefly inside CS's car at VICTOR THOMPSON's house, located at 400 W. 117th Street. During the meeting, surveillance observed DENTON leave CS's car and briefly enter 400 W. 117th Street. After a short period of time, DENTON came out of 400 W. 117th Street and returned to CS's car. According to CS, once in the car DENTON gave CS just under a quarter ounce of crack cocaine, rather than the two-and-a-half ounces CS had ordered. Referring then to a future purchase of two-and-a-half ounces, CS stated, "That ... two-and-a-half, what that gonna be so he'll know?" DENTON responded, "63, 63." CS then clarified, "I'm talking about what's the price," to which DENTON replied "Oh, fifteen

⁶ The quoted material from these selected consensually-recorded conversations is based on summaries of the recordings, not final transcripts. My interpretations of the calls are based on information provided by CS's in the case, as well as on my training and experience, the experience of other law enforcement agents, and my knowledge of this investigation.

hundred.” According to CS, CS then paid DENTON \$200, and surveillance observed CS and DENTON drive away from the location together in CS's car. CS related that he dropped DENTON off approximately one block away, near 116th and Stewart, and then drove to a prearranged location to meet with agents. Once there, CS gave agents the approximately 6.8 grams of crack cocaine he had purchased from DENTON, as well as the remaining \$1600 in buy money. CS and his car were again searched by agents for excess cash and contraband, with negative results.

B. CS's December 19, 2006 Controlled Purchase of Crack Cocaine From SHAWN DENTON

23. On December 19, 2006, CS conducted a second controlled purchase of crack cocaine from DENTON. Recorded calls were made to set up the deal on December 13 and December 19, 2006, with DENTON and CS exchanging a series of phone calls prior to and after the deal. In one recorded call on December 19, 2006, CS let DENTON know he was on the way. Then, in an unrecorded call, the two arranged to meet at the McDonald's Restaurant parking lot, located at 114th Street and Halsted.

24. Before the deal, agents searched CS and his car for the presence of cash and illegal contraband, with negative results. Agents then outfitted CS with a body-recording device and a transmitter. Agents also provided CS with \$1500 in pre-recorded funds to be used towards the purchase of two-and-one-half ounces of crack cocaine. Surveillance then followed CS as he drove to the McDonald's parking lot.⁷ Once there, surveillance observed DENTON pull into the parking lot, get out of his car, and walk to CS's car, where he entered the passenger side door. A short time later, DENTON exited CS's car, got back inside his own, and drove out of the McDonald's parking

⁷ Once at McDonald's, and prior to meeting with DENTON, CS asked agents if he could get something to eat. Agents gave CS permission to get something to eat while he was awaiting DENTON, and heard CS through the transmitter buying food at McDonald's.

lot. Following the deal, DENTON informed CS in a recorded call, "You know I got that ... on the green side ... the price good, too," meaning that he had marijuana available for sale as well. CS stated that he would "holler at him, see what he want to do," meaning pretend to ask his father whether he wanted to purchase marijuana from DENTON in the future. Surveillance then followed CS to a prearranged meet location, where he turned over to agents approximately 63 grams of crack cocaine he had purchased from DENTON. Agents then again searched CS's person and car for extra contraband or cash, with negative results.

V. THE CONSPIRACY'S USE OF FIREARMS AND VIOLENCE

A. Firearms

25. During the course of this conspiracy, VICTOR THOMPSON, SEAN DENTON, and HERBERT TAYLOR discussed possessing firearms and/or committing drug thefts and robberies on numerous occasions in wire-tapped conversations. I know from my training and experience, as well as the experience of other law enforcement agents who specialize in investigating gangs, that drug dealers frequently carry guns and other weapons. They do so (1) to protect themselves from robbery of their drugs by rival gang members and others, (2) to protect their drugs, which are extremely valuable, often worth thousands of dollars, and (3) to use in robbing other drug dealers of valuable narcotics and cash. Because many gang members are involved in distributing drugs, and for the reasons just stated, I know that gang membership, violence, and drug dealing go hand-in-hand.

26. For example, on September 13, 2006 at 10:40 a.m. (Call #18), DENTON, using Target Phone 1, discussed guns with Individual B. Individual B related, "When I got shot and I found who did it, I was gonna shoot they ass." DENTON asked, "You ever shot a gun?" Individual B stated, "Yep." DENTON and Individual B then discussed that it was illegal to carry a handgun in Chicago, and

discussed the best place to store guns. Individual B stated, "I would keep it in a safe." DENTON replied, "OK, how you gonna get to it? A mother fucker break into your house, what you gonna do, 'Let me go in the safe and get the gun?'" DENTON continued, "I raised my kids around guns. I keep my gun on the floor by the bed ... my daughter know, don't go to daddy's side of the bed, period[.]" Denton further continued, "... I keep a pistol, I keep it, if I'm in my car I got one[.]"

27. On October 10, 2006 at approximately 9:18 p.m. (call#2724), DENTON was intercepted over Target Phone 1 stating, "...So I say, 'Alright, I be right back.' So I go in the house and get my pistol and put it on me. I come back out to holler at them because I'm not knowing ...what's happening. This could be a stick up, you know what I'm saying?" Individual B replied, "Uh-huh." DENTON then said, "Or whatever. That's...what I always think, the worst." Individual B replied, "Uh-huh." DENTON continued, "So I got my pistol on me, shit, he's hollering at me, 'Man, you know I heard you be having some weed, woo-woo-woo ...' Man, I'm like, 'I got some money, man, I want to shop with you...woo-woo-woo. Cause what I was doing one time I was giving this girl out there some. You know what I'm saying?' Individual B replied "Uh-huh." Denton continued, "And what she did was went and told him, 'He the main man out there.' You know what I'm sayin'?" Individual B replied, "Uh-huh." DENTON stated, "Then I say, 'Man, I've seen you in the hundreds.' I'm like, 'I'm from the hundreds.' He's like, 'Straight up, man. You know [Individuals C and D]?' I'm like, 'Yeah, they's from my block. You know what I'm saying?' Then he like, 'Ok.' That's just to get his mind off of sticking a mother fucker up."

28. I believe that in this call DENTON described arming himself with a gun in order to prepare for a confrontation with someone who might rob him ("So I say, 'Alright, I be right back.' So I go in the house and get my pistol and put it on me. I come back out to holler at them because I'm not knowing ... what's happening. This could be a stick up, you know what I'm saying?"). The

individual DENTON armed himself to meet discussed that he had heard DENTON sold marijuana, and claimed he had money on him to purchase marijuana (“So I got my pistol on me, shit, he’s hollering at me, ‘Man, you know I heard you be having some weed, woo-woo-woo ... I want to shop with you, woo-woo-woo.’”). DENTON then continued to explain that he had sold drugs to a female who knew this individual, and the female had informed the individual that DENTON was the street boss who ran drug trafficking in the area (“‘Cause what I was doing one time, I was giving this girl out there some, you know what I’m saying?...And what she did was went and told him, ‘He the main man out there.’ You know what I’m sayin?’”). DENTON then explained how he had engaged the individual in a conversation in order to distract him from wanting to rob DENTON (“He’s like, ‘Straight up, man. You know [Individuals C and D]?’ I’m like, ‘Yeah, they’s from the my block. You know what I’m saying?’ Then he like, ‘Ah...ok.’ That’s just to get his mind off of sticking a mother fucker up.”).

B. Discussions About Drug Thefts and Robberies

1. September 13, 2006

29. On September 13, 2006 at 10:40 a.m. (Call #18), DENTON, using Target Phone 1, told Individual B, “Did I ever tell you I took \$11,000 off him? ... He don’t even know me, he don’t even know how I look or nothing, you know? ... Yeah, I took \$11,000 ... That’s when I had that weed he wanted, 10 pounds of weed, I was gonna sell it to him for \$11,000, but how he knew I had it was through my uncle’s girlfriend ... So I sent him a little piece, he checked it out, he loved it. So I told him the only way I could fuck with him is through her [DENTON’s uncle’s girlfriend], because I don’t know him, he could be police, or stick up man ...” DENTON went on to explain, “So he acted like he didn’t want to give this money, then all of a sudden she [DENTON’s uncle’s girlfriend]

called me out of the blue one morning, she say, 'I got that money.'" DENTON then described that he counted the money brought to him by his uncle's girlfriend, but it was approximately "\$400 short."

30. DENTON then continued, "... I told my OLD MAN [VICTOR THOMPSON],⁸ I said, 'Man, I'm about to do a move,' I said, 'Take her in the basement.' He took her in the basement ... I went out the front door ... I had the weed but why give the weed up? I don't even know this mother fucker, you see what I'm saying?" DENTON continued, "He [the unknown male who had intended to purchase the marijuana through the female] went over to the Vice Lords, to Individual E, that's my guy, he is the one that running Vice Lords. He [Individual E] say, 'Man, if them niggers ain't kill you, man, you better forget about that shit ... They got you ... forget about that shit, that money been gone, that was bill money.'" DENTON then stated, "I gave my OLD MAN half of it and we split it down the middle, we always do that."

31. I believe that in this call DENTON was explaining how he had stolen money from a man intending to use it towards the purchase of 10 pounds of marijuana ("Did I ever tell you I took \$11,000 off him? He don't even know me, he don't even know how I look or nothing, you know? ... Yeah, I took \$11,000 ... That's when I had that weed he wanted, 10 pounds of weed, I was gonna sell it to him for \$11,000). DENTON explained that the male had intended to purchase the marijuana through DENTON's uncle's girlfriend ("how he knew I had it was through my uncle's girlfriend ..."), but because the male did not know what DENTON looked like, DENTON stole the money when the girlfriend brought it over. DENTON further explained that his contact in the Vice Lords had instructed the male whose money had been stolen not to attempt to get his money back

⁸ I know that "OLD MAN" is a reference to VICTOR THOMPSON because in Call #5885 occurring over Target Phone 1 THOMPSON referred to himself as "OLD MAN."

(“He say, ‘Man, if them niggers ain’t kill you, man, you better forget about that shit ... They got you ... forget about that shit, that money been gone, that was bill money.’”). DENTON further explained that he and VICTOR THOMPSON had split the proceeds from the theft, as they always do (“I gave my OLD MAN half of it and we split it down the middle, we always do that.”).

2. September 18, 2006

32. On September 18, 2006 at 5:52 p.m. (Call #5373), HERBERT TAYLOR, aka “HERB,” “GIGGA MAN,” and “HEARD,” called DENTON over Target Phone 1 and told him that Individual F had called. TAYLOR explained, “we’ll go around the corner on the next, on the next move, you know what I’m saying, because she don’t even know me. I’ll fuck around, and when I make the corner, just keep on going.” DENTON then became excited and asked TAYLOR to “Give her to me[.]” TAYLOR, also becoming excited, replied, “They know what they gonna get when they come around there.” TAYLOR and DENTON then discussed that they would change their phone numbers if they were able to “pull that move.” DENTON concluded by telling TAYLOR, “Man, lets put that together, man. Make it happen, GIGGA, make it happen.”

33. I believe that in this call DENTON and HERBERT TAYLOR were planning to rob Individual F of drug money. I further believe that TAYLOR told DENTON that the fear of violence would keep Individual F from coming after them (“They know what they gonna get when they come around there.”).

34. Later that day, at approximately 6:10 p.m. (Call # 783), DENTON, using Target Phone 1, contacted VICTOR THOMPSON, who was using Target Phone 3, and stated, “I might got something up, that’s what I trying to tell yo, baby ... HEARD, the bitch that I put him on, her brother trying to holler right half-way.” DENTON then explained to THOMPSON, “You know what I’m saying? Like, like we done [Individual G].” THOMPSON, apparently wanting to get in on the

robbery, responded, "Listen, they ain't never seen me, did they? ... They got to see somebody get the money ... They got to see somebody get the papers ... Pull up, get the paper and go on ahead on." DENTON then told THOMPSON that TAYLOR would be off work in about an hour, at which time THOMPSON told DENTON, "Man, I be there, don't worry about it."

35. I believe that DENTON was calling THOMPSON to include THOMPSON in the robbery of drug money that he and TAYLOR were planning. I believe that the money to be robbed was planned to be used towards the purchase a quantity of cocaine, likely ½ kilogram ("HEARD, the bitch that I put him on, her brother trying to holler right half-way."). DENTON then compared it to another robbery he and THOMPSON had done together ("You know what I'm saying? Like, like we done [Individual G]"). I believe that THOMPSON then instructed DENTON that he, THOMPSON, should be the one to actually steal the money, since the victims had never seen THOMPSON before ("Listen, they ain't never seen me, did they? ... They got to see somebody get the money ... They got to see somebody get the papers"). THOMPSON further explained to DENTON what he, THOMPSON, would do when stealing the money (" ... Pull up, get the paper and go on ahead on.").

36. A few minutes later at 6:27 p.m. (Call # 5379), DENTON, using Target Phone 1 contacted THOMPSON, using Target Phone 3. THOMPSON stated, "Hey man, you and HERB ain't doing nothing without me ... Hey baby, don't make me send the squad at y'all niggas." I believe that in this call THOMPSON was instructing DENTON not to commit the robbery without him, or in retaliation, he would call the police ("don't make me send the squad at y'all niggas.").

37. Following these calls, several calls were exchanged among TAYLOR, DENTON, and THOMPSON. These calls revealed that TAYLOR was unable to get a hold of Individual G, and therefore the robbery could not be carried out.

3. October 9, 2006

38. On October 9, 2006 at 6:33 p.m. (Call 2678), DENTON, using Target Phone 1, contacted Individual H. DENTON informed Individual H that he had “something that will put something in our pocket, you know what I’m saying?” DENTON went on to describe a “nigga on 111th ... that everyone be gettin’ their, you know, their little (UI) from. You know?” Individual H said, “Right.” DENTON continued, “He got about ten and about a nine in the sinafe. And a pistol. Everything in the sinafe, you know what I’m saying?” DENTON continued by explaining, “I went with some scary niggas, man, me, [Individual I] and [Individual K] ... but they didn’t know what they was doing ... when I saw that they was scared, I’m like, fuck it, I already know who to get to do it ... I need y’all.” Individual H then asked, “You gone be able to walk right in?” DENTON answered, “Yeah, it’s sweet ... that will put money in our pocket ... If we don’t get him, somebody else gonna get him. It’s so sweet.”

39. Individual H then explained that he wanted to bring someone along with them who “gonna fire that thing ... like me. He fire like me. Anybody that fire that thing like me, I gotta have ‘em on my side ... because anything can happen, you know ... me and my homie gonna go gangsta. We just gonna go straight ... we gonna go straight gangsta.” DENTON then suggested that they “tape that nigga’ up,” but Individual H said, “Homie, did you hear what I just said?” DENTON advised Individual H, “Be smooth sometimes ... we might get at least ... like a nine piece outta that, about ten.” Individual H then said, “I do things ... professional ... you be watchin’ the news, and a lot of that shit be me. You just didn’t know.”

40. I believe that in this call DENTON and Individual H were planning to home invade a drug dealer who lived on 111th Street in Chicago and steal guns from him (“He got about ten and about a nine in the sinafe. And a pistol... We might get at least ... like a nine piece outta that”). I believe

that DENTON was explaining that the guns were stored in a safe (“sinafe”). I further believe that Individual H was planning to carry guns to the robbery (“we gonna go straight gangsta”).⁹

4. October 29, 2006

41. On October 29, 2006, at approximately 4:07 p.m. (Call# 7351), DENTON, using Target Phone 1, received an incoming call from an unknown male (FNU LNU). FNU LNU stated, “SHAWN, I got somethin’. I need a motha’ ... I need some...I need a motha’ fucker to make a move with me Tuesday. Not with me, but Tuesday, man, motha’ fucker gonna be up at Dryer’s, man. This mark be havin’ like fifteen, twenty in his pocket, ya hear me?” DENTON replied “Shit, it done. All you had to do is ... fill me in ... I can make it happen. Fill me in, man. Let me know somethin’.” FNU LNU stated, “Oh... I lettin’ you know ... I’m gonna be chirpin’ ya. There’s nothin’ to him. All we gotta do is follow this nigga’s actions, man. It’s easy, he a sweet nigga, and he got rock like [a well-known rap singer] in his ear, and he might have some on his wrist and his neck, too...but I know the man gonna have like twenty in his pocket. Last week, a bitch tell me last week ... that the nigga had like twenty five in his pocket.” DENTON replied “Oh ...We got him.” FNU LNU then stated, “And she say he always keep all his money on him like that.” DENTON replied, “Yeah we got him.”

42. I believe that in this call an unknown male (FUN LNU) called DENTON and informed him that he [FNU LNU] was planning on robbing someone of money and jewelry and needed help (“SHAWN, I got somethin’. I need a motha’ ... I need some...I need a motha’ fucker to make a move with me, Tuesday. Not with me but, Tuesday, man, motha fucker gonna be up at Dryer’s. This mark be havin’ like fifteen, twenty in his pocket, ya hear me?”). DENTON then told the unknown

⁹ On November 2, 2006, Individual H was himself the victim of a home invasion. Although he was shot 22 times, he survived.

male that he [DENTON] would assist in the robbery (“Shit, it done. All you had to do is, you know, fill me in ... I can make it happen”). FNU LNU informed DENTON that they would follow the victim and rob him. FNU LNU went on to inform DENTON that the victim was known to wear expensive jewelry like a well-known rap artist, and may have large amounts of cash (up to \$25,000) on his person (“It’s easy, he a sweet nigga, and he got rock like [a well-known rap singer] in his ear, and he might have some on his wrist and his neck, too...but I know the man gonna have like twenty in his pocket. Last week, a bitch tell me last week, after ...I was up there. Seen the nigga and everything, but the bitch tell me the next day that the nigga had like twenty-five in his pocket.”) DENTON then reassured FNU LNU that he [DENTON] would assist in the robbery (“Yeah, we got him.”).

VI. INTERCEPTED WIRE COMMUNICATIONS

43. On September 12, 2006, Chief Judge James F. Holderman of the Northern District of Illinois entered an order authorizing the 30-day interception of wire communications occurring to and from Target Phone 1, the cellular telephone bearing number (773) 858-6416, subscribed to SHAWN DENTON, 20549 Attica Road, Olympia Fields, Illinois.

44. On October 17, 2006, Chief Judge James Holderman entered an order authorizing the continued interception of wire communications over Target Phone 1 for 30 days, as well as the 30-day interception over Target Phone 3, a prepaid cellular telephone assigned telephone number (773) 640-2546 and subscribed to Patricia Johnson, 400 West 117th Street, Chicago, Illinois 60628. Target Phone 3 was used by VICTOR THOMPSON. In short, court-authorized Title III monitoring of Target Phone 1 began on September 13, 2006 and continued until November 17, 2006, with the exception of five days between October 12, 2006 through October 17, 2006. Court-authorized Title III monitoring of VICTOR THOMPSON (Target Phone 3) began on October 18, 2006 and

continued until November 15, 2006.

VII. ANALYSIS OF INTERCEPTED CONVERSATIONS

45. Numerous conversations were intercepted over Target Phones 1 and 3. Summaries of the intercepted calls set forth in this Affidavit are based on draft transcripts, call summaries, and line sheets— not final transcripts. The summaries do not refer to every topic discussed during the conversation, nor do the summaries include every statement made by the speaker about the topic discussed. Times given for the intercepted calls are approximations.

46. In each paragraph following the summary of an intercepted call, I have set forth my interpretations or understandings of certain words and phrases used during the conversation. My interpretations and understandings are based on my knowledge of the investigation to date, the context of the intercepted conversations, both prior and subsequent intercepted conversations, my training and experience, conversations I have had with other officers and agents experienced in narcotics and gang investigations, and on information provided by cooperating witnesses throughout the investigation. Generally, my interpretation of each conversation follows the summary of it. Times given for intercepted communications summarized below are approximations, and each defendant's voice identification is discussed in their respective sections.

A. VICTOR THOMPSON

47. THOMPSON oversees drug trafficking for the organization. SHAWN DENTON and other co-conspirators report to THOMPSON regarding drug sales, as well as the quantity and quality of drugs that are being sold on the street, among other things. THOMPSON also instructs DENTON how to cook crack cocaine.

48. On September 15, 2006 at 9:19 p.m. (Call #5157), DENTON, using Target Phone 1, stated to VICTOR THOMPSON, using Target Phone 3, "Hey, [Individual K] like, 'Is everything OK, you

OK, do he need anything’?”¹⁰ THOMPSON replied, “Them niggas gonna get worried, get worried baby, get worried, they fear me, man, these niggas, time to get worried right now.”

49. I believe that in this call DENTON was informing THOMPSON that Individual K was calling to make sure THOMPSON did not need anything from him. I also believe that THOMPSON was describing how he is feared by others.

50. On September 18, 2006 at 11:40 a.m. (Call #5363), DENTON, using Target Phone 1, called VICTOR THOMPSON, using Target Phone 3, and stated, “Hey I’m about to ride out west real quick ... holler at ROD, tell him we can put something together, there is plenty out here, you know what I’m saying? He said come holla at him.” THOMPSON responded, “Right, right.” DENTON then stated, “...When what’s his name give me that paper this week we go see cuz, you know what I’m saying, old girl.” THOMPSON responded, “Right, I’m hoping old Individual K fixin’ to give me a holler, you know?” DENTON stated, “Be back in a minute, I’m fixin’ to head out there.”

51. I believe in this call that THOMPSON and DENTON were discussing setting up a drug deal with Individual K (DENTON: “tell him we can put something together, there is plenty out here”). I further believe that in this call DENTON and THOMPSON were discussing their receipt of a drug payment from another individual (THOMPSON: “...When what’s his name give me that paper this week we go see cuz, you know what I’m saying, old girl.”).

52. On September 25, 2006 at 12:38 p.m. (Call 1458), DENTON was intercepted over Target Phone 1 instructing CAROLINE SPARKMAN, “VIC say hold everything ‘till he get back.” CAROLINE SPARKMAN responded, “What you mean ‘hold everything?’ I ... gone ahead and do

¹⁰ VICTOR THOMPSON’s voice was identified, among other ways, through Call #6 over Target Phone 3 on October 18, 2006 at 4:21 p.m. During this call THOMPSON was contacted by a carpet cleaning service, and a woman on the line stated, “Hi, is Mr. THOMPSON in?” THOMPSON responded, “Who?” The woman repeated, “Mr. Thompson.” THOMPSON said, “Yea, is speaking.”

what he told me to do.” DENTON replied, “Right, and just hold it.” SPARKMAN then said, “Ok.” I believe that in this call DENTON was passing along VICTOR THOMPSON’s instructions to CAROLINE SPARKMAN, who works for THOMPSON and DENTON, to hold onto drugs or money.

53. On September 27, 2006 at 4:18 p.m. (Call #5885), VICTOR THOMPSON, using Target Phone 3, stated to SHAWN DENTON, using Target Phone 1, “You know what you need to do, ride and see if [Individual K] is up there.” DENTON responded, “Then what?” THOMPSON replied, “If he up there, then you tell him, ‘Damn, my OLD MAN been looking for you man, I think he want to borrow some paper from you,’ and then hit me up and then I’m gonna go from there.”

54. I believe that in this call THOMPSON told DENTON to contact Individual K in order to borrow money (“paper”) from him.

55. On October 3, 2006 at 3:44 p.m. (Call 6020), VICTOR THOMPSON, using Target Phone 3, contacted DENTON, using Target Phone 1, and said, “I’ve been tryin’ to hit ya, boy ... what did ya want me to get from ‘DRE?” DENTON answered, “I think he owes me 100, maybe 120.” THOMPSON responded, “He wouldn’t give it to me, man. He told me he don’t want to go through that same shit no more, man.”

56. I believe that in this call THOMPSON and DENTON were discussing the repayment of a drug debt that ANDRE SPARKMAN [“DRE,” *see* footnote 14] owed DENTON. I further believe that THOMPSON was acting as the middle-man in negotiating the transaction.

57. On October 22, 2006 at 1:12 p.m. (Call #5417) VICTOR THOMPSON was intercepted using Target Phone 3 calling DENTON, using Target Phone 1. THOMPSON stated, “My man just here, say he be over here in about an hour.” DENTON replied, “What was they talking about? So I ... can get it together.” THOMPSON answered, “Two and a half.”

58. I believe in this call THOMPSON informed DENTON that one of THOMPSON'S drug customers was going to be in the area in one hour ("My man just here, say he be over here in about an hour."). DENTON asked THOMPSON about the quantity of drugs the customer was going to need ("What was they talking about? So I ... can get it together."). THOMPSON informed DENTON that the customer needed a quantity of drugs, likely two and one half ounces ("Two and a half.").

59. On November 1, 2006 at 1:33 p.m. (Call# 4100) SHAWN DENTON received an incoming call over Target Phone 1 from VICTOR THOMPSON. THOMPSON stated, "Man...you ain't gonna believe what I got in my pocket." DENTON replied, "Aw man...don't do that, man..." THOMPSON stated, "Man, I not gonna lie to you man...I'm about to throw this shit outta here." DENTON responded, "Man just be looking out...be ready to throw that shit out." THOMPSON added, "Yeah...I'm 'bout to get off the expressway in one second, 'bout to pull up right now, can't believe this, man." DENTON replied, "I'm gonna open the door."

60. I believe in this call THOMPSON informed DENTON that he [THOMPSON] had drugs and was worried about getting caught with them (THOMPSON: "Man...you ain't gonna believe what I got in my pocket." DENTON: "Aw man, don't do that man..." THOMPSON: "Man, I not gonna lie to you, man...I'm about to throw this shit outta here."). When DENTON became concerned about THOMPSON getting caught with the drugs, THOMPSON stated that he was in the area (near DENTON) getting off the expressway ("Yeah...I'm 'bout to get off the expressway in one second, bout to pull up right now, can't believe this, man."). DENTON then informed THOMPSON he would meet THOMPSON ("I'm gonna open the door.").

61. On November 10, 2006 at 7:15 p.m. (Call# 4967) DENTON made an outgoing call over Target Phone 1 and spoke to THOMPSON. DENTON stated, "Man I done had some bad luck....My move broke on me." THOMPSON responded, "Where at?" DENTON replied, "At the house. I went back to the house 'cause, you know, I ain't been, you know.... I went back 'cause people kept on, you know what I'm saying." THOMPSON then stated, "You know you can still do it though." DENTON replied, "No. It's all in the, uh, the ..." At which point THOMPSON interrupted DENTON and said, "It don't matter...man you got to do, all you got to do is scrape, all you got to do is scrape, scrape, scrape." DENTON replied, "And put it back in there." THOMPSON added "And back in the ... oil...it's going to separate ... then pull that on out of there, and then redo it again, and you there." DENTON then said, "Glass almost hit me and shit ... I wonder why it did that because I didn't use it but twice." THOMPSON explained, "But, no, see it got wet out there...the outside got wet." DENTON then stated, "I say ... this shit must have happened for a reason." THOMPSON replied, "Slowed your roll, you know what I'm saying?" DENTON then said, "I got to tell you, I need a lil' time to get that paper up." THOMPSON replied, "OK, get him, tell him I'll see him in one minute." DENTON then said, "OK, what time you getting here?" THOMPSON replied, "I ain't gonna be too long."

62. I believe in this call DENTON was explaining to THOMPSON that he was upset because he [DENTON] ruined a batch of crack cocaine while cooking it. DENTON informed THOMPSON that people were buying more crack than he had available on the street to sell, and consequently, he had to return home to make more crack cocaine ("Man I done had some bad luck....My move broke on me ... at the house. I went back to the house cause you know, I ain't been, you know.... I went back 'cause people kept on you, know what I'm saying."). THOMPSON then instructed DENTON how to salvage the crack cocaine ("You know you can still do it though ... It don't matter...all you

got to do is scrape, all you got to do is scrape, scrape, scrape ... And back in the oil...It's going to separate ... Then pull that on out of there and then redo it again and you there.”). THOMPSON told DENTON that this incident slowed the drug sales (“Slowed your roll, you know what I’m saying?”). When DENTON explained to THOMPSON that it was going to take him extra time to collect the drug money as a result of this incident (“I got to tell you, I need a lil’ time to get that paper up.”), THOMPSON offered to collect the money (“get him, tell him I’ll see him in one minute.”)

63. On November 11, 2006 at 9:45 a.m. (Call# 4993) DENTON made an outgoing call using Target Phone 1 and spoke to THOMPSON. THOMPSON stated, “What’s up? Did you get it straight?” DENTON replied, “Na, I left today...maybe you can go with me.” THOMPSON stated, “All you have to do is...put the water back to it.” DENTON replied, “It’s in a ...you know how you have to lift the stove up?” THOMPSON then said, “Yeah...Just scrape that shit up.”

64. I believe in this call THOMPSON asked DENTON about the crack cocaine that DENTON had ruined the previous day (“What’s up? Did you get it straight?”). DENTON then told THOMPSON that he was not able to salvage the crack cocaine, and asked if THOMPSON could help him (“Na, I left today...maybe you can go with me.”). THOMPSON again informed DENTON that he could still recover the crack cocaine if he cooked it with more water (“All you have to do is...put the water back to it.”). DENTON then informed THOMPSON that the crack cocaine fell inside the stove (“It’s in a...you know how you have to lift the stove up?”). THOMPSON again told DENTON that he just had to scrape the crack cocaine from the stove (“Just scrape that shit up.”).

B. SHAWN DENTON

65. According to CS, and as made clear from the wiretaps and controlled buys in this case, DENTON oversees drug sales for VICTOR THOMPSON, cooks powder cocaine into crack cocaine, and sells crack at the organization’s “spot,” located at 116th and Stewart. As set forth in paragraph

18 above, CS has also related that DENTON is THOMPSON's god-son. Nineteen controlled purchases of crack cocaine (totaling 131.62 grams) were made from DENTON during this investigation. *See ¶ 19.*

66. On September 13, 2006 at 2:43 p.m. (Call #51), DENTON received an incoming call over Target Phone 1 from Individual L.¹¹ Individual L asked DENTON, "What you do, fire ole' TOP FLITE [DARRYL EDWARDS]?"¹² DENTON responded, "Naw, he out here somewhere. That nigga ain't shit either, you know what I'm saying? He doing so much crooked shit, think a motherfucker don't know about it ... But when VIC get this good shit, man, he ain't gone need him, cause Individual M supposed to bring some shit, that good shit like I had." DENTON went on to say, "But the shit just high, it's one-twenty, he supposed to be bring some of that today ... but FLITE [DARRYL EDWARDS] ain't gonna be needed, this motherfucker double juggling, going to [Individual O] getting pieces and shit. Think a mother fucker don't know. He'll take the dope money, go get a piece and try to double it, like it's slow out here." DENTON then complained, "[EDWARDS] ain't been through a jab, I probably went through two and he ain't went through one."

67. I believe that in this call DENTON was complaining that DARRYL EDWARDS was

¹¹ SHAWN DENTON's voice was identified, among other ways, through Call # 275 over Target Phone 1 from September 15, 2006 at 10:42 a.m. In this call, DENTON contacted Watson Motor Sports to inquire about obtaining credit approval for a car he wanted to purchase. During the call, a women on the line asked DENTON to spell his first and last name, and he replied "S-H-A-W-N D-E-N-T-O-N." DENTON was also asked for his phone number, to which he replied "773 858-6414," Target Phone 1's number. DENTON also informed the women his residence was "20549 Attica Road, Olympia fields, 60461," the address Target Phone 1 is subscribed to, and stated that he had resided there "about four years." DENTON's voice was also identified through the 19 undercover buys conducted by Chicago Police officers and CS.

¹² I know that "TOP FLITE" is a nickname for DARRYL EDWARDS because on June 27, 2006 EDWARDS invited the UCO who had just bought crack from him to call him for future purchases, and wrote down the phone number he later used during the wire along with the name "TOP FLITE." This UCO had previously picked EDWARDS out of a line up on May 25, 2006. In addition, later on during the investigation, a different UCO who bought crack from EDWARDS referred to him as "FLITE" during a recorded buy on October 7, 2006.

cheating THOMPSON (“VIC”) and DENTON out of drug proceeds (“He doing so much crooked shit, think a motherfucker don’t know about it ... this motherfucker double juggling, going to [Individual O] getting pieces and shit ... He’ll take the dope money, go get a piece and try to double it, like it’s slow out here.”). I further believe that DENTON was explaining that VICTOR THOMPSON would soon be obtaining better quality drugs that were also more expensive (“But when VIC get this good shit ... [Individual M] supposed to bring some shit. That good shit like I had ... But the shit just high, it’s one-twenty[.] ”). I believe DENTON was further complaining that he was selling twice as many drugs as EDWARDS (“[EDWARDS] ain’t been through a jab, I probably went through two and he ain’t went through one.”).¹³

68. Later that date at 3:05 p.m. (Call #5066), DENTON received a call from DARRYL EDWARDS over Target Phone 1. DENTON asked EDWARDS, “OLD MAN say what, you ain’t hustling no more?” EDWARDS replied, “Yeah, I’m washing these clothes, my whites, man, drying out my whites right now.” DENTON stated, “Alright, I’m on my second one, I’m ‘bout to go in the house for a minute, I’m tired.” EDWARDS responded, “I’m finna come out.”

69. I believe that in this call DENTON was relating to EDWARDS that THOMPSON was inquiring why he (EDWARDS) was not out selling drugs (“OLD MAN say what, you ain’t hustling no more?”). I believe that EDWARDS replied that he was packaging and/or getting ready to sell cocaine (“I’m washing these clothes, my whites, man, drying out my whites right now.”). I believe that DENTON then informed EDWARDS he (DENTON) had already sold one quantity of drugs and was now selling his second (“I’m on my second one”).

¹³ I know from my training and experience that a “jab” is a street term for a quantity of drugs.

70. On September 14, 2006 at 2:50 p.m. (Call # 8), DENTON received an incoming call over Target Phone 1 from an unknown male (FNU LNU) and asked him, "What you need?" FNU LNU responded, "Two of them." DENTON replied, "OK." FNU LNU then informed DENTON, "I'll be in your car."

71. I believe that in this call FNU LNU was ordering crack cocaine from DENTON ("Two of them"). I further believe that FNU LNU was informing DENTON that the drug deal would occur in DENTON's car ("I'll be in your car.").

72. On September 15, 2006 at approximately 10:34 a.m. (Call #273), DENTON received an incoming call over Target Phone 1 from a different unknown male (FNU LNU). FNU LNU stated, "... I can be there in fifteen minutes. I got the truck cause I gotta run out to another school. So can you have ... four?" DENTON replied, "Yeah." The unknown male then stated, "Alright, I'll be there in a few minutes."

73. I believe that in this call FNU LNU was calling DENTON to order drugs ("So can you have ... four?"). I further believe that FNU LNU was describing for DENTON which car FNU LNU would be driving so that DENTON could identify him ("I got the truck.").

74. Following this call, a CPD surveillance team observed a white van drive to 411 W. 116TH Street. CPD then observed DARRYL EDWARDS (whom CPD had made multiple undercover purchases of crack cocaine from by this date) ride a bicycle to a location near the white van, get off the bicycle, walk to the driver's side door of the van, and stick his arm and head inside the van. Moments later, the van left the area.

75. On September 15, 2006 at 11:22 a.m. (Call 5103), DENTON was intercepted over Target Phone 1 conversing with ONDRAY MCKNIGHT. MCKNIGHT stated, "You still couldn't come

up with nothing?" DENTON replied, "No, not yet." MCKNIGHT then said, "Right now I could roll with an eighth, man, I need one."

76. I believe that in this call MCKNIGHT was asking to purchase a quantity of cocaine from DENTON ("Right now I could roll with an eighth, man, I need one.").

77. On September 20, 2006 at 11:31 a.m. (Call# 918), a CPD UCO placed a recorded call to DENTON over Target Phone 1. In summary, the UCO asked DENTON if he was in the area, at which time DENTON told the UCO, "Yeah, what's happening ... I'm gonna meet with you." The UCO then stated, "... where you wanna try and meet at? ... Are you ... gonna meet me at the spot?" The UCO was referring to the area of 116th and Stewart, where he had previously bought cocaine from DENTON. DENTON answered, "As a matter of fact you can come on down now." The UCO then said, "Ok, about ten-fifteen minutes."

78. The UCO, who was outfitted with a body-recording device, then traveled to the area of 116th and Stewart, where he encountered DENTON waiting for him inside of a grey Dodge Neon. When the UCO entered the car, DENTON asked him how many he needed. The UCO informed DENTON that he needed "ten." DENTON then removed a clear plastic bag from his jacket pocket and counted out twelve small plastic zip-lock plastic bags containing a total of 2.2 grams of crack cocaine. DENTON placed the crack cocaine in a white napkin and handed the napkin to the UCO. The UCO tendered \$100 in prerecorded funds to DENTON and left the car.

79. On September 24, 2006 at 1:04 p.m. (Call #5731), DENTON, using Target Phone 1, informed HERBERT TAYLOR, "Man, my ... people been running from me ... Man they been going everywhere else except here." TAYLOR responded, "Right, right, I'm a check into that when I get back, I'll find out what's going on." DENTON then complained, "I got too much of it left." TAYLOR replied, "I'll check it out and see what's happenin' ... when I come back, anyway, I'm a

have ... hopefully some new and what not, you know what I'm saying?"

80. I believe that in this call DENTON was complaining about the quality of drugs he had received from HERBERT TAYLOR ("Man, my... people been running from me ... Man they been going everywhere else except here."). DENTON was further complaining that his customers were not buying from DENTON the drugs he had received from TAYLOR because the drugs were of such poor quality ("I got too much of it left."). I believe that TAYLOR was trying to placate DENTON by telling him he would look into the problem and get DENTON a better quality supply ("Right, right, I'm a check into that when I get back, I'll find out what's going on Yeah, yeah, I'll check it out and see what's happen' ... I'm a have ... hopefully some new and what not, you know what I'm saying?").

81. On September 25, 2006 at 5:25 p.m. (Call #1506), DENTON was intercepted over Target Phone 1 telling an unknown individual (FNU LNU) that he had "bad news." DENTON went on to relate, "This is bullshit I got from HERB ... it ain't right ... I told him, man, I didn't have this shit a whole week and he made \$200."

82. I believe that in this call DENTON was complaining to FNU LNU about the poor quality drugs he had received from HERBERT TAYLOR, aka HERB.

83. On November 4, 2006, at approximately 8:49 a.m. (Call# 4343) DENTON, using Target Phone 1, received an incoming call from an unknown male (FNU LNU). FNU LNU stated, "Yo, is DRE still hurting? What's up? Hey, no mother fuckers posted on Stewart, man?" DENTON replied, "You say what?" FNU LNU responded, "Hey, no mother fuckers posted on Stewart?" DENTON stated, "They lost?" FNU LNU responded, "No, I found out, mother fucker found out the boy is riding through heavy." DENTON stated, "Who ... some niggas?" FNU LNU stated, "No, customers, mother fucker." DENTON replied, "Oh...they not around there?" FNU LNU stated,

“No, ain’t nobody out here, man... I got about six customers out here.” DENTON went on to say “Let me call...um...I’ll hit ya right back.”

84. I believe that in this call an unknown male asked DENTON if he had anyone out on the street selling drugs, specifically ANDRE SPARKMAN aka “DRE”¹⁴ (“Yo is “DRE” still hurting? What’s up? Hey no mother fuckers posted on Stewart, man?”). I believe the unknown male then informed DENTON that six customers were at the drug spot, but that no one was around to sell them drugs (“... customers, mother fucker ... ain’t nobody out here, man... I got about six customers out here.”) I believe that DENTON then told FNU LNU he would make a call to resolve the problem (“Let me call...um...I’ll hit ya right back.”).

C. HERBERT TAYLOR aka “GIGGA,” aka “HERB,” aka “GIGGA MAN

85. Wiretapped calls reveal that HERBERT TAYLOR is a supplier for the THOMPSON organization. He is also sometimes supplied drugs by the THOMPSON organization.¹⁵

86. On October 05, 2006, at approximately 6:16 p.m. (call# 2141), SHAWN DENTON was intercepted over Target Phone 1 speaking with HERBERT TAYLOR. DENTON stated, “What I can get a nine for...About... how much?” TAYLOR responded, “All with what you was talking about ... I have to call him and see, I don’t know, cause this ... a new guy, you know? You know I ain’t fucking with dude no more.”

¹⁴ CS picked ANDRE SPARKMAN out of a photo spread and stated that he knew him as DRE.

¹⁵ HERBERT TAYLOR’s voice was identified, among other ways, through Target Phone 1 and a covert CPD interview of TAYLOR conducted on October 6, 2006. On that date, in Call # 2192 over Target Phone 1, SHAWN DENTON spoke with a male at phone number (773) 447-5820 who said he was working on 125th and Elizabeth Streets. Undercover CPD officers, suspecting that the male using this number was HERBERT TAYLOR, drove to that location armed with a CPD booking photo of TAYLOR. Upon identifying TAYLOR at that location from the booking photo, the officers pretended they were looking for handyman-type services, and asked TAYLOR if he knew anyone who could help them. TAYLOR then said that he could, and wrote down the name “HERB” on the back of a business card, as well as phone number (773) 447-5820. Each of the calls made by TAYLOR that are outlined in this Affidavit occurred over phone number (773) 447-5820.

87. I believe that in this call DENTON asked TAYLOR how much nine ounces of cocaine would cost (“What I can get a nine for...About..how much?”). TAYLOR explained to DENTON that he had a new source of supply for his cocaine, and did not know how much nine ounces of cocaine would cost (“I don’t know, cause this ... a new guy you know?”). TAYLOR also informed DENTON that he did not use his old source of supply anymore (“You know I ain’t fucking with dude no more.”).

88. On September 25, 2006, at approximately 5:25 p.m. (call# 1506), DENTON was intercepted over Target Phone 1 speaking with an unknown individual (FNU LNU). DENTON stated, “Got some bad news.” FNU LNU asked, “What?” DENTON responded, “Nothin’, this is bullshit I got from HERB, I was wondering why this ... it ain’t right.” FNU LNU replied, “Yeah.” DENTON then stated “I told him, ‘Man, I didn’t have this shit a whole week,’ and he made two hundred dollars.”

89. I believe that in this call DENTON was complaining that he obtained some poor quality crack cocaine from TAYLOR. DENTON further complained that TAYLOR had made \$200 from selling DENTON the poor quality crack (“I didn’t have this shit a whole week and he made two hundred dollars.”).

90. On September 16, 2006, at approximately 7:43 p.m. (call# 491), DENTON, using Target Phone 1 called TAYLOR. DENTON stated, “I’m in two cars, I’m in a truck and a “Q” car.” TAYLOR replied, “Oh, alright.” DENTON then told TAYLOR, “You can ... put it in the truck and get in the car with me, I got to holler at you anyway.”

91. I believe that in this call DENTON discussed meeting with TAYLOR to conduct a narcotics transaction. DENTON instructed TAYLOR to put the contraband in a nearby truck and then get in the car DENTON was in (“Put it in the truck and get in the car with me.”).

92. On October 04, 2006, at approximately 7: 56 a.m. (call# 1973), DENTON was intercepted using Target Phone 1 calling TAYLOR. DENTON stated, "Yeah, I ain't even been hustling, 'cause that shit is bullshit, you know I'm gonna throw that shit in the garbage." TAYLOR replied, "God damn, huh? Look like ... I don't know what to ..." DENTON then interrupted, "Throw that shit in the garbage, man, I gotta take an eight-hundred-dollar loss."

93. I believe that in this call DENTON complained to TAYLOR about the quality of the cocaine he had ("Yeah, I ain't even been hustling, cause that shit is bullshit, you know I'm gonna throw that shit in the garbage."). TAYLOR was surprised by DENTON's complaint ("God damn, huh? Look like ... I don't know what to ..."). DENTON instructed TAYLOR to throw away any additional cocaine from that supply, and complained that he was losing \$800 ("Throw that shit in the garbage, man, I gotta take an eight hundred dollar loss.").

94. On November 08, 2006, at approximately 5:43 p.m. (call# 8055), DENTON was intercepted over Target Phone 1 speaking with TAYLOR. DENTON stated, "Hey, I'm gonna go get me another phone tomorrow. I'm gonna get my ... number and shit changed. I'm gonna give you the chirp, probably tomorrow." TAYLOR agreed, "Yeah, 'cause I kinda want to change my number too, man." DENTON responded, "Yeah, we just had (UI)." TAYLOR replied, "Too long, man, too long." DENTON went on to say, "Plus I'm kinda leery of ol' girl, you know what I'm sayin', the one I was heading about the car wash...Yeah, I popped her again today, you know." TAYLOR responded, "...Well handle you business, man, ... I'm gonna change mine too, man." DENTON stated, "Yeah, the bitch mentioned something about some, uh, 'girlfriends,' you know what I'm sayin'? Say she can get them, that kind of scared me, you know what I'm saying?" TAYLOR then told DENTON, "Hey, you gotta spin her another way, man, you know, let a nigga like me go that route with 'em, you know what I'm saying, you know how I'd do it...She don't know me."

DENTON replied, “Yeah, I need to sit and talk to you then, ‘cause she supposed to call me back tomorrow and let me know ... some information on them, you know what I’m saying? Cause I was just curious, you know what I’m sayin’?”

95. I believe that in this call DENTON informed TAYLOR that he (DENTON) was going to get a new phone (“Hey, I’m gonna go get me another phone tomorrow. I’m gonna get my ... number and shit changed. I’m gonna give you the chirp, probably tomorrow.”). TAYLOR agreed that they had kept their phones for too long (“Yeah, ‘cause I kinda want to change my number too, man.”). I know that drug dealers often change phones and phone numbers in an effort to avoid law enforcement monitoring of their phone calls.

96. In addition, DENTON also told TAYLOR about some concerns he had related to his [DENTON’S] dealings with a female customer of his. I believe the “customer” DENTON was describing was the female UCO in this case, as a controlled buy had occurred with the female UCO on this date (*see* ¶ 19) (“Plus I’m kinda leery of ol’ girl, you know what I’m sayin’, the one I was heading about the car wash...Yeah, I popped her again today, you know.”). In addition, the female undercover had asked DENTON during the buy from that date if he wanted to purchase guns, as described by DENTON (“Yeah, the bitch mentioned something about some, uh, ‘girlfriends,’ you know what I’m sayin’, say she can get them, that kind of scared me, you know what I’m saying?”). I know that “girlfriend” is a common street term for guns, and that is what the UCO meant by the term when she used it in this recording.

97. In addition, I believe that TAYLOR told DENTON that he should have the female customer (undercover officer) deal directly with TAYLOR. Since the customer did not know TAYLOR, TAYLOR reasoned, he could harm her without any repercussions to DENTON (“Hey, you gotta spin her another way, man, you know, let a nigga like me go that route with ‘em, you know what

I'm saying, you know how I'd do it...She don't know me.")). DENTON told TAYLOR that they should talk about the situation in further detail, as the female customer was supposed to call DENTON back ("Yeah, I need to sit and talk to you then, 'cause she supposed to call me back tomorrow and let me know ... some information on them, you know what I'm saying? Cause I was just curious, you know what I'm sayin'?").

98. On November 15, 2006, at approximately 5:23 P.M. (call# 8251), DENTON was intercepted calling TAYLOR over Target Phone 1. DENTON stated, "Hey, you need anything? I got ... straight, you know?" TAYLOR responded, "You got what?" DENTON replied, "I said I'm straight, through CASH, you know what I'm saying?" TAYLOR then said, "OK, I'm a hit you right back, alright?" DENTON replied, "Alright."

99. I believe that in this call DENTON informed TAYLOR that he [DENTON] had just received drugs from ONDRAY MCKNIGHT, and wanted to know if TAYLOR needed any drugs ("I said I'm straight through CASH, you know what I'm saying?"). TAYLOR told DENTON he would get in touch with him later ("Ok, I'm a hit you right back, alright?").

D. ONDRAY MCKNIGHT, aka "Tricky", aka "Cash"

100. Wiretapped calls reveal that ONDRAY MCKNIGHT both sells crack cocaine for and supplies crack to the THOMPSON organization.¹⁶

101. On October 21, 2006, at approximately 10:47 p.m. (call# 6712), SHAWN DENTON was intercepted over Target Phone 1 speaking with ONDRAY MCKNIGHT. DENTON stated, "Hey, the white boy say he be there in about thirty minutes." MCKNIGHT responded, "10-4. I'll be

¹⁶ ONDRAY MCKNIGHT's voice was identified, among other ways, on November 3, 2006 when Chicago Police officers conducted a traffic stop on MCKNIGHT for identification purposes. MCKNIGHT provided officers with his driver's license during the stop, and told officers that his nickname was "TRICKY." Following this stop, MCKNIGHT was intercepted in Call #7808 complaining to SHAWN DENTON that he had just been stopped by the police and stating that he needed to get a different car.

here.” DENTON then stated, “The one from yesterday.” MCKNIGHT answered, “Yes sir.”

102. I believe that in this call DENTON called MCKNIGHT to inform him that a white male customer had contacted DENTON for narcotics and would be at the drug spot within a half-hour (“Hey, the white boy say he be there in about thirty minutes”). MCKNIGHT agreed that he would be ready for the customer (“10-4. I’ll be here.”). DENTON also reminded MCKNIGHT that he [MCKNIGHT] would recognize the customer as being the same one from the previous day (“The one from yesterday.”).

103. On October 27, 2006, at approximately 7:16 a.m. (call# 7179), ONDRAY MCKNIGHT called SHAWN DENTON on Target Phone 1. MCKNIGHT stated, “Hey, you only slid, you only slid him a dozen of those too, didn’t you? Twelve ... You know, on us, on me and you.” DENTON responded, “Right.” MCKNIGHT then said, “So you got a few more?” DENTON answered, “No, what do you mean?” MCKNIGHT replied, “Remember I slid you, it was like, twenty-nine I think, something like that?” DENTON answered, “Yeah, he got two more ... he got two more left.” MCKNIGHT then said, “He didn’t have them last night, that’s what I’m saying, did you get...you give him...you gave him all of those?” DENTON answered, “All of them... ‘cause before I left I ...he had one-fifty on the other side and on our side he owed ten more, that made it one-sixty.” MCKNIGHT then stated, “Right. Then ... you slid him all... all of us, right?” DENTON replied, “Yeah...that’s what I saying, I gave him all of us, which waswe had popped everything except forty-five, right, he give me thirty-five, you know what I’m saying, which made him owe ten more.” MCKNIGHT then stated, “Okay, the OLD MAN (VICTOR THOMPSON) had sent me like ... one-seventy.” DENTON asked, “One what?” To which MCKNIGHT replied, “Naw, as a matter of fact, it was one-forty-two.” DENTON then said, “It was one-fifty-five...it was ...one-fifty-three and two dollars worth of change.”

104. I believe that in this call DENTON and MCKNIGHT were discussing income brought in from drug sales at the spot during the previous night. MCKNIGHT asked DENTON if he [DENTON] had provided their street-seller twelve bags of narcotics before DENTON left the area last night (“Hey, you only slid, you only slid him a dozen of those too didn’t you?”). I believe that MCKNIGHT and DENTON then continued to discuss the amount of narcotics sold the previous day (“Yeah...that’s what I saying I gave him all of us which was ...we had popped everything except forty-five, right, he give me thirty-five...You know what I’m saying, which made him owe ten more.”). MCKNIGHT also informed DENTON that THOMPSON had sent over some cash (“Okay, the OLD MAN (THOMPSON) had sent me like ... one-seventy ... naw, as a matter of fact it was one- forty-two ... it was one-fifty-five...it was ...one-fifty-three and two dollars worth of change.”).

105. On November 1, 2006, at approximately 7:29 p.m. (call# 7678), DENTON was intercepted over Target Phone 1 speaking with ANDRE SPARKMAN. SPARKMAN stated, “I’ve been trying to ... hit dude up to let him know I only got, you know, pisinoky four, but I can’t get it to go through, my phone acting silly again.” DENTON responded, “He on his way...CASH (ONDRA Y MCKNIGHT) on his way.”¹⁷ SPARKMAN replied, “Good, that’s what I needed to, I need.”

106. I believe that in this call SPARKMAN informed DENTON he only had four bags of crack cocaine left, and was trying to get re-supplied (“hit dude (MCKNIGHT) up to let him know I only got ... I only got, you know, pisinoky four”). DENTON then told SPARKMAN that he would send MCKNIGHT to re-supply him with drugs (“He on his way...CASH on his way.”)

107. On November 4, 2006 at approximately 8:55 a.m. (call# 4346), DENTON, using Target Phone 1, called CAROLINE SPARKMAN and stated, “Hey, is CASH (ONDRA Y MCKNIGHT)

¹⁷ I know “CASH” to be ONDRA Y MCKNIGHT’s nickname because CPD and Illinois Department of Corrections (“IDOC”) records from prior arrests and prison sentences reflect as much.

out there?” SPARKMAN replied, “No. He didn’t make it here yet.” DENTON again asked, “Nigga ain’t out there?” SPARKMAN stated, “Nah huh.” DENTON then said, “Oh shit. They said there is people everywhere down there.” SPARKMAN agreed, stating, “Hmm hmm.” DENTON then said, “Ok ... we’ll be there shortly.”

108. I believe that in this call DENTON asked CAROLINE SPARKMAN if ONDRAY MCKNIGHT was selling drugs at the spot (“Hey, is CASH out there?”). SPARKMAN told DENTON that MCKNIGHT was not outside. DENTON appeared to be upset, and told SPARKMAN that because there were several people waiting to buy crack cocaine (“there is people everywhere down there”), he would arrive shortly.

109. On November 5, 2006, at approximately 2: 49 p.m. (call# 4491), DENTON was intercepted over Target Phone 1 speaking with THOMPSON. During the call, THOMPSON asked DENTON to put ANDRE SPARKMAN on the phone. Once SPARKMAN came onto the line, THOMPSON asked, “Everybody like it? Does anybody like it?” SPARKMAN responded, “[Individual P] said it was ...hot.” THOMPSON then asked, “Right, is that what they say about CASH?” SPARKMAN replied, “Yeah, but ...he said this ain’t his stuff...he said he got from somebody.”

110. I believe that in this call THOMPSON was inquiring about the quality of the crack cocaine being sold by SPARKMAN for the organization (“Everybody like it? Does anybody like it?”). SPARKMAN assured THOMPSON that a customer [Individual P] said the crack cocaine was “hot,” a street term denoting good quality. THOMPSON then asked SPARKMAN if the crack was as good as the crack he [SPARKMAN] had received from ONDRAY MCKNIGHT (“Right, is that what they say about CASH?”). SPARKMAN informed THOMPSON that the crack cocaine he [SPARKMAN] was selling was not MCKNIGHT’S own crack, but was crack MCKNIGHT had received from another source of supply (“Yeah, but ...he said this ain’t his stuff..he said he got from somebody”).

111. On November 13, 2006 at approximately 9:05 a.m. (call#5170), DENTON spoke with Individual B over Target Phone 1. DENTON stated, "OLD MAN...he said DRE is fucked up again. I already told TRICKY [ONDRAY MCKNIGHT] to fuck him up."¹⁸ Individual B replied, "DRE been fucking up? What is he doing?" DENTON stated, "He's fucked up. I'm tired of his fucking partying on us, talking about somebody stole his shit." Individual B then said, "Are you serious...I would fuck him up. Fuck him up one real good time. I bet he won't do that shit no more." DENTON replied, "Yeah, cuz that shit...nobody can afford that bullshit man." Individual B stated, "I'm telling you, SHAWN, you got to fuck him up. One real good time. I bet he won't do that again." DENTON replied, "I know, if you said it's right..."

112. I believe that in this call DENTON informed Individual B that he spoke with THOMPSON ("Old Man") who related that ANDRE SPARKMAN (DRE) was high on crack cocaine. DENTON also related that he told ONDRAY MCKNIGHT (TRICKY) to physically harm SPARKMAN ("Old Man...he said DRE is fucked up again. I already told TRICKY to fuck him up."). DENTON continued by telling Individual B that SPARKMAN was high on crack cocaine, and stated that he was tired of SPARKMAN using DENTON'S supply of crack cocaine to support his drug habit. DENTON further complained to Individual B that SPARKMAN had claimed his supply of crack cocaine had been stolen, when in fact he had used it for himself ("He's fucked up. I'm tired of his fucking partying on us. Talking about somebody stole his shit."). Individual B advised DENTON that he should physically beat up ANDRE SPARKMAN so it would scare him enough to never "lose" his supply of crack cocaine again ("I would fuck him up. Fuck him up one real good time. I bet he won't do that shit no more.").

¹⁸ I know "Tricky" to be ONDRAY MCKNIGHT's nickname for the reasons outlined in footnote 16.

E. DARRYL EDWARDS aka “TOP FLITE,” “FLITE”

113. Repeated surveillances and controlled buys of crack cocaine have demonstrated that DARRYL EDWARDS sells crack for the organization on a regular basis. During the investigation, eight controlled purchases of crack cocaine (totaling 8.13 grams) were made from DARRYL EDWARDS by a CPD UCO (*see* ¶ 19).¹⁹

114. On September 13, 2006 at 2:43 p.m. (Call #51), DENTON received an incoming call over Target Phone 1 from Individual L. Individual L asked DENTON, “What you do, fire ole’ TOP FLITE [DARRYL EDWARDS]?” DENTON responded, “Naw, he out here somewhere. That nigga ain’t shit either, you know what I’m saying? He doing so much crooked shit, think a motherfucker don’t know about it ... But when VIC get this good shit, man, he ain’t gone need him, cause [Individual M] supposed to bring some shit, that good shit like I had.” DENTON went on to say, “But the shit just high, it’s one-twenty, he supposed to be bring some of that today ... but FLITE ain’t gonna be needed, this motherfucker double juggling, going to [Individual O], getting pieces and shit. Think a mother fucker don’t know. He’ll take the dope money, go get a piece and try to double it, like it’s slow out here.” DENTON then complained, “[EDWARDS] ain’t been through a jab, I probably went through two and he ain’t went through one.”

115. I believe that in this call DENTON was complaining that DARRYL EDWARDS was cheating THOMPSON and DENTON out of drug proceeds (“He doing so much crooked shit, think a motherfucker don’t know about it ... this motherfucker double juggling, going to [Individual O],

¹⁹ EDWARDS’s voice was identified, among other ways, during the eight undercover buys that were made from him during the course of this investigation. In addition, EDWARDS provided an undercover officer his telephone number on June 27, 2006 (773 827-5565) during the course of one of the controlled purchases. This was the same telephone number EDWARDS typically used during the wiretaps, and was the number used during all the calls in which EDWARDS is listed as a speaker in this Affidavit.

getting pieces and shit ... He'll take the dope money, go get a piece and try to double it, like it's slow out here."'). I further believe that DENTON was explaining that VICTOR THOMPSON would soon be obtaining better quality drugs that were also more expensive ("But when VIC get this good shit ... [Individual M] supposed to bring some shit. That good shit like I had ... But the shit just high, it's one-twenty[.]"). I believe DENTON was further complaining that he was selling twice as many drugs as EDWARDS ("[EDWARDS] ain't been through a jab, I probably went through two and he ain't went through one."').

116. Later that date at 3:05 p.m. (Call #5066), SHAWN DENTON received a call from DARRYL EDWARDS over Target Phone 1. DENTON asked EDWARDS, "OLD MAN say what, you ain't hustling no more?" EDWARDS replied, "Yeah, I'm washing these clothes, my whites, man, drying out my whites right now." DENTON stated, "Alright, I'm on my second one, I'm 'bout to go in the house for a minute, I'm tired." EDWARDS responded, "I'm finna come out."

117. I believe that in this call DENTON was relating to EDWARDS that VICTOR THOMPSON was inquiring why he (EDWARDS) was not out selling drugs ("OLD MAN say what, you ain't hustling no more?"). I believe that EDWARDS replied that he was packaging and/or getting ready to sell cocaine ("I'm washing these clothes, my whites, man, drying out my whites right now."). I believe that DENTON then informed EDWARDS he (DENTON) had already sold one quantity of drugs and was now selling his second ("I'm on my second one").

118. On September 15, 2006 at approximately 10:34 a.m. (Call #273), DENTON received an incoming call over Target Phone 1 from an unknown male (FNU LNU). FNU LNU stated, "... I can be there in fifteen minutes. I got the truck cause I gotta run out to another school. So can you have ... four?" DENTON replied, "Yeah." The unknown male then stated, "Alright, I'll be there in a few minutes."

119. I believe that in this call FNU LNU was calling DENTON to order drugs (“So can you have ... four?”). I further believe that FNU LNU was describing for DENTON which car FNU LNU would be driving so that DENTON could identify him (“I got the truck.”).

120. Following this call, a CPD surveillance team observed a white van drive to 411 W. 116TH Street. CPD then observed DARRYL EDWARDS ride a bicycle to a location near the white van, get off the bicycle, walk to the driver’s side door of the van, and stick his arm and head inside the van. Moments later, the van left the area.

121. On October 6, 2006 at approximately 12:31 p.m. (call# 2213), DENTON received a telephone call over Target Phone 1 from DARRYL EDWARDS. EDWARDS stated, “I’m at my guy’s crib ... what’s happening?” DENTON asked, “Whose crib?” EDWARDS replied, “Over at my guy’s crib, a couple blocks from my crib, what’s up?” DENTON stated, “Where we at? Oh, we all good ...I’m at the spot.” DARRYL EDWARDS replied, “Okay. I’m gonna shoot over there.”

122. I believe in this call that EDWARDS informed DENTON he was at a friend’s house (“Over at my guy’s crib, a couple blocks from my crib.”). DENTON then informed EDWARDS that he (DENTON) was at the drug spot located at 116th and Stewart, and had drugs available to sell (“Oh we all good ... I’m at the spot”). EDWARDS then informed DENTON that he was on his way over.

123. On October 6, 2006 at approximately 5:47 p.m. (call# 2257), DENTON was intercepted using Target Phone 1. DENTON stated to Individual L, “Yeah, TOP FLITE, man, he got the wrong idea about hustling ... He doing it for the high ... Mother fucker gonna be depending on this little money.” Individual L replied, “Hell yeah. Get used to it.” DENTON replied “Shit, it’s money.”

124. I believe that in this call, SHAWN DENTON told Individual L that EDWARDS sold drugs to pay for his drug habit (“TOP FLITE, man, he got the wrong idea about hustling ... He doing it for the high.”).

125. On October 20, 2006 at approximately 8:39 a.m. (call# 90) VICTOR THOMPSON was intercepted using Target Phone 3 to call SHAWN DENTON, who was using Target Phone 1. THOMPSON stated, "Yeah, so he [ONDRAY MCKNIGHT] got there till you got there. He was out there at seven, but I don't think he hollered at shit." DENTON replied, "Oh, he got TOP FLITE out there. I ain't gonna fuck with him." THOMPSON replied, "Oh, he got TOP FLITE out there."

I believe that in this call THOMPSON told DENTON that ONDRAY MCKNIGHT had been working at the drug spot since 7:00 a.m. selling crack cocaine, but had not had many sales ("Yeah, so he [ONDRAY MCKNIGHT] got there till you got there. He was out there at seven, but I don't think he hollered at shit."). DENTON then informed THOMPSON that because EDWARDS was now also out there, he was not going to head over to the "spot" ("Oh, he got TOP FLITE out there. I ain't gonna fuck with him."), and THOMPSON agreed ("Oh. He got TOP FLITE out there.").

126. On October 20, 2006 at approximately 1:58 p.m. (call #3185) DENTON was intercepted using Target Phone 1 talking to an unknown male (FNU LNU). FNU LNU stated, "Are you on the spot?" DENTON replied, "Yep. Hey, my buddy out there, you'll see him. He in a truck. TOP FLITE out there too. Go mess with them. ... You on your way?" FNU LNU stated, "Yeah, but will they know me like you know me?" DENTON replied, "Yeah, they'll know you. He got a orange hoody on."

127. I believe that in this call an unknown male (FNU LNU) called DENTON to see if DENTON was outside selling drugs ("Are you on the spot?"). DENTON told FNU LNU that he could buy the drugs from one of the people selling drugs for him at the "spot," including EDWARDS ("Yep. Hey my buddy out there, you'll see him. He in a truck. TOP FLITE out there too. Go mess with them.")

128. On October 28, 2006 at approximately 6:16 p.m. (call# 3767), DENTON was intercepted over Target Phone 1 talking to Individual L. DENTON stated, "You know what I'm saying? 'Cause

Kenny, that's three hundred, and her, that's five." Individual L replied, "You never hollered at TOP FLITE about her?" DENTON replied, "Uh huh." Individual L stated, "Man, you can't go that...." DENTON replied, "She say TOP FLITE the one that told her thatthey were nicks." Individual L replied, "Oh." DENTON then stated, "Ain't that some heavy shit, ...What he get outta that...cause he won't fuck with us no more.." DENTON continued, "She said 'I thought he was straight up. I would never have thought' ...You know what I'm saying.?"

129. I believe that during this call DENTON told Individual L that the two CPD undercover officers in this case (one of whom had always identified himself as Kenny, the other of whom was female and had just purchased crack cocaine from DENTON earlier in the day, *see* ¶ 19) were purchasing an average of five hundred dollars of crack cocaine from him [DENTON] at the drug spot ("You know what I'm saying? 'Cause Kenny, that's three hundred, and her that's five"). Individual L asked DENTON if he had asked DARRYL EDWARDS about the female undercover, wondering if she was the police ("You never hollered at TOP FLITE about her?"). DENTON informed Individual L that the female undercover had told him EDWARDS had told her she was buying five dollar bags of crack cocaine for ten dollars from DENTON ("She say TOP FLITE the one that told her thatthey were nicks."). DENTON then told Individual L he wondered why EDWARDS would tell the female undercover that ("Ain't that some heavy shit ...What he get outta that..."). 130. On October 30, 2006 at approximately 5:25 p.m. (call# 7427), DENTON using Target Phone 1, was intercepted telling DARRYL EDWARDS, "Give me the money." EDWARDS replied, "All right. Here I come." DENTON directed him to "meet me at DRE's house."

131. I believe that in this call DENTON told EDWARDS to meet him at ANDRE SPARKMAN'S (DRE's) house and to give DENTON the money EDWARDS had collected from selling crack

cocaine at the drug spot (116th and Stewart) (“Give me the money.”).

F. ANDRE SPARKMAN aka "DRE"

132. Wiretapped calls reveal that ANDRE SPARKMAN sells drugs for the THOMPSON organization. Three controlled purchases of crack cocaine (totaling 14.5 grams of crack cocaine) have been made from SPARKMAN (*see* ¶ 19).²⁰

133. On October 25, 2006, at approximately 7:04 p.m. (call# 7038), ANDRE SPARKMAN called DENTON. SPARKMAN stated, “They want to know if they can get five for forty-five?” DENTON responded, “Whatever you think, you know they been (UI) ... did you hear me? What you say?” ANDRE SPARKMAN replied, “Yeah, I heard you.”

134. I believe that in this call SPARKMAN asked DENTON if he [SPARKMAN] could sell five ten-dollar bags of crack cocaine for a total of forty-five dollars in order to give a discount to the customer (“They want to know if they can get five for forty-five?”). DENTON instructed SPARKMAN to do what he thought was good business (“Whatever you think”).

135. On October 28, 2006, at approximately 8:12 p.m. (call# 7300), an unknown female (FNU LNU) called SHAWN DENTON over Target Phone 1 and asked, “You down the street? You got ‘nicks’?” DENTON replied, “Yeah, holler at DRE.”

136. I believe that in this call a drug customer contacted SHAWN DENTON to buy crack cocaine (“You down the street?”). The customer then asked DENTON about purchasing five dollar bags of crack cocaine (“You got ‘nicks’?”). DENTON acknowledged he had crack cocaine available for sale, and directed the customer to see ANDRE SPARKMAN for the crack (“Yeah, holler at DRE”).

²⁰ ANDRE SPARKMAN’s voice was identified, among other ways, through the three controlled purchases of crack cocaine that were made from him on October 19, October 26, and October 28, 2006. During the October 19, 2006 buy, the undercover officer asked SPARKMAN what his name was, and he replied “ANDRE.” The UCO then picked SPARKMAN out of a photo spread on October 20, 2006.

137. On October 29, 2006, at approximately 3:42 p.m. (call# 7347), SHAWN DENTON was intercepted over Target Phone 1 calling ANDRE SPARKMAN. DENTON asked SPARKMAN, "Hey, come see if you know this nigga." ANDRE SPARKMAN replied, "Here I come." DENTON then stated, "If you don't know him, don't fuck with him."

138. I believe that in this call DENTON discussed a drug customer whom he did not recognize. I believe that DENTON contacted SPARKMAN to identify the individual because SPARKMAN was a regular drug seller for the organization who was more familiar with the group's customers. DENTON warned SPARKMAN not to deal with the potential customer if SPARKMAN did not know him.

139. On November 7, 2006 at approximately 8:36 a.m. (call#4586), THOMPSON called DENTON on Target Phone 1. THOMPSON stated, "What's the video?" DENTON replied, "Chillin.' What's the business?" THOMPSON answered, "Hey, I'm heading into the city ... you gotta get "DRE" (ANDRE SPARKMAN) up. He's already looking like..." DENTON interrupted, "Oh, you already hit him?" To which THOMPSON answered, "Yeah." DENTON then said, "He give you what he owes you? ... I got some of it, but he owes seventeen more dollars." THOMPSON stated, "He gave me ten dollars." DENTON replied, "Okay, I got the rest, but he owes seven more dollars." THOMPSON said, "Yeah...alright then."

140. I believe that in this call THOMPSON was asking DENTON what was going on at the drug spot ("What's the video?"). DENTON told THOMPSON that business on the drug spot was slow ("Chillin.' What's the business?"). THOMPSON then told DENTON that he was heading into the city, and that DENTON needed to check on ANDRE SPARKMAN because SPARKMAN was not looking well ("you gotta get DRE up. He's already looking like..."). DENTON then asked THOMPSON if SPARKMAN had given him money that SPARKMAN owed THOMPSON for drug

sales. DENTON told THOMPSON that SPARKMAN had paid him some of the proceeds from selling crack cocaine, but still owed seventeen more dollars (“I got some of it but he owes seventeen more dollars.”).

141. On November 5, 2006, at approximately 2: 49 p.m. (call# 4491), DENTON was intercepted over Target Phone 1 speaking with THOMPSON. During the call, THOMPSON asks DENTON to put ANDRE SPARKMAN on the phone. Once SPARKMAN came onto the line, THOMPSON asked, “Everybody like it? Does anybody like it?” SPARKMAN responded, “[Individual P] said it was ...hot.” THOMPSON then asked, “Right, is that what they say about CASH?” SPARKMAN replied, “Yeah, but ...he said this ain’t his stuff...he said he got from somebody.”

142. I believe that in this call THOMPSON was inquiring about the quality of the crack cocaine being sold by SPARKMAN for the organization (“Everybody like it? Does anybody like it?”). SPARKMAN assured THOMPSON that a customer [Individual P] said the crack cocaine was “hot,” a street term denoting good quality. THOMPSON then asked SPARKMAN if the crack was as good as the crack he [SPARKMAN] had received from ONDRAY MCKNIGHT (“Right, is that what they say about CASH?”). SPARKMAN informed THOMPSON that the crack cocaine he [SPARKMAN] was selling was not MCKNIGHT’S own crack, but was crack MCKNIGHT had received from another source of supply (“Yeah, but ...he said this ain’t his stuff..he said he got from somebody”).

143. On October 25, 2006, at approximately 7:04 p.m. (call# 7033), SHAWN DENTON was intercepted over Target Phone 1 talking to ANDRE SPARKMAN. SPARKMAN stated, “Here I come, SHAWN, I’m getting your paper. I’m on my way now.”

144. I believe that in this call SPARKMAN informed DENTON that he was bringing over proceeds earned from the sale of narcotics (“Here I come, SHAWN, I’m getting your paper. I’m on my way now.”).

145. On November 1, 2006, at approximately 7:33 P.M. (call# 4150), DENTON was intercepted over Target Phone 1 speaking with THOMPSON. THOMPSON asked, "What did he say?" DENTON then passed the phone to ANDRE SPARKMAN. THOMPSON then asked SPARKMAN, "Why you ain't get back with me?" SPARKMAN answered, "I was in a deep, you know, I wing out...It's all gravy. Hey, they didn't make more, but it good." THOMPSON then asked, "They didn't make water?" SPARKMAN replied, "No... But it's the business....Gee, I'm sorry I ain't went out." THOMPSON replied, "Okay, I ain't worried about that, DRE, alright, but I'm saying, give me a reading though, you know what I'm saying?" SPARKMAN said, "Oh, yeah, naw, it ain't you, you know, get down...You know what I'm saying, but you can work with it." THOMPSON then asked, "Yeah, but I'm saying, on a scale now, you know? I know it ain't no, gave good to you, but I'm saying a scale, where do you put it?" SPARKMAN replied, "A seven...a seven, eight, like that." THOMPSON went on to say, "How's it to the ones out there?" SPARKMAN replied, "Straight up again...You can't mess with that."

146. I believe that in this call THOMPSON was asking about the quality of the crack cocaine being sold by SPARKMAN for the organization ("Yeah, but I'm saying, on a scale now, you know, I know it ain't no, gave good to you, but I'm saying a scale, where do you put it?" SPARKMAN: "A seven...a seven, eight like that"). THOMPSON also asked SPARKMAN how this particular batch of crack cocaine compared to the crack cocaine that was already being sold at the drug spot ("How's it to the ones out there?"). SPARKMAN informed THOMPSON that it was of high quality, as usual ("Straight up again...You can't mess with that").

G. CAROLINE SPARKMAN aka "DINA"

147. CPD surveillances and CAROLINE SPARKMAN's driver's license have shown that

CAROLINE SPARKMAN lives at 415 W. 116th Street with ANDRE SPARKMAN.²¹ Four undercover buys of crack cocaine have occurred at the 116th Street residence, and an additional five undercover buys occurred in DENTON's car when it was parked in front of the house. CS has related that CAROLINE SPARKMAN stores drugs for THOMPSON, and related that approximately two years ago, when he was hanging out regularly with THOMPSON and DENTON at THOMPSON's house on 117th Street, he heard THOMPSON tell C. SPARKMAN on at least four occasions to "Go get that." Following this instruction, C. SPARKMAN left THOMPSON's home and returned with crack cocaine, which she then handed to THOMPSON. Accordingly, based on CAROLINE SPARKMAN's residence at 415 W. 116th Street where multiple undercover buys occurred, as well as some of the recorded calls from this investigation and CS's observations, I believe that C. SPARKMAN stores drugs for THOMPSON in her home. Wiretapped calls further reveal that C. SPARKMAN also monitors drug activity at the spot for THOMPSON and DENTON. C. SPARKMAN also acts as a lookout for the organization and passes messages between those at the spot selling drugs and THOMPSON and DENTON.²²

148. On September 25, 2006 at 12:38 p.m. (Call #1458), DENTON was intercepted over Target Phone 1 instructing CAROLINE SPARKMAN, "VIC say hold everything 'till he get back."

²¹ A search warrant for the 415 W. 116th Street address is being sought in connection with this criminal complaint. Descriptions of surveillances occurring at this location are included in the affidavit accompanying the search warrant application.

²² CAROLINE SPARKMAN's voice was identified, among other ways, during a traffic stop conducted by CPD officers on November 9, 2006. SPARKMAN was the driver of the car, and provided officers with her driver's license. VICTOR THOMPSON was the passenger. During this stop, which occurred at approximately 8 p.m., officers seized \$185 in cash from the two, as earlier in the day (at approximately 12:30 p.m.) a UCO had bought around 7.2 grams of crack cocaine from DENTON for \$250 in pre-recorded funds, and officers wanted to see whether any of the funds would be in THOMPSON's possession by that point [they were not]. Immediately following the stop, THOMPSON called DENTON (Call #4875) using Caroline SPARKMAN's cellular telephone, which was subscribed in her name and address. THOMPSON told DENTON in the call that the police stole money from him and "DINA."

SPARKMAN responded, "What you mean 'hold everything?' I ... gone ahead and do what he told me to do." DENTON replied, "Right, and just hold it." SPARKMAN answered, "Ok."

149. I believe that in this call DENTON was passing along VICTOR THOMPSON's instructions to CAROLINE SPARKMAN about a matter related to narcotics trafficking.

150. On November 4, 2006 at approximately 8:55 a.m. (Call# 4346), DENTON, using Target Phone 1, called CAROLINE SPARKMAN and stated, "Hey, is CASH (ONDRAY MCKNIGHT) out there?" SPARKMAN replied, "No. He didn't make it here yet." DENTON again asked, "Nigga ain't out there?" SPARKMAN stated, "Nah huh." DENTON then said, "Oh shit. They said there is people everywhere down there." SPARKMAN agreed, stating, "Hmm hmm." DENTON then said, "Ok ... we'll be there shortly."

151. I believe that in this call DENTON asked CAROLINE SPARKMAN if ONDRAY MCKNIGHT was selling drugs at the spot ("Hey, is CASH out there?"). SPARKMAN told DENTON that MCKNIGHT was not outside. DENTON appeared to be upset, and told SPARKMAN that because there were several people waiting to buy crack cocaine ("there is people everywhere down there"), he would arrive shortly.

152. On November 7, 2006 at approximately 3:31 p.m. (call#4835), CAROLINE SPARKMAN called DENTON over Target Phone 1. C. SPARKMAN asked, "Can I talk to VIC for a second? It's important too." When the phone was passed to VICTOR THOMPSON, C. SPARKMAN told him, "Look, you know that car you told me about? ... You said they be reportin' to that car, and then they ... you know ... they make their little circle?" THOMPSON replied, "Uh huh." C. SPARKMAN continued, "They did it. They was on Yale when they did it." THOMPSON again answered, "Uh-huh." C. SPARKMAN continued, "Right. I'm just telling ya, I just seen 'em." THOMPSON said, "Yeah, he always be around." C. SPARKMAN then related, "...right, but they in our area."

THOMPSON replied, "Uh huh. We ain't worried about 'em. We ain't on nothing. You know what I'm sayin'?" C. SPARKMAN responded, "Yeah." THOMPSON then concluded, "10-4."

153. I believe that in this call, CAROLINE SPARKMAN reminded THOMPSON that he had told her to let him know about a certain police car that patrolled the area ("Look, you know that car you told me about, and you said they be reportin' to that car? And then they...you know...they make their little circle?"). C. SPARKMAN informed THOMPSON that she had seen the police car drive around Yale Avenue ("They did it. They was on Yale when they did it."). THOMPSON then informed C. SPARKMAN that he was not worried about the police because he did not have anyone selling drugs at the spot at that time ("We ain't worried about 'em. We ain't on nothing. You know what I'm sayin'?").

154. On November 9, 2006 at approximately 4:30 p.m. (call#4835), CAROLINE SPARKMAN called DENTON on Target Phone 1 and stated, "ANDRE say he needs you." DENTON replied, "Ok, here I come." SPARKMAN replied, "Ok."

155. I believe that in this call CAROLINE SPARKMAN called DENTON to inform him that ANDRE SPARKMAN needed DENTON to supply him with more crack cocaine ("ANDRE say he needs you."). I believe that DENTON then told CAROLINE SPARKMAN that he was on his way to the drug spot ("Ok, here I come").

156. On November 9, 2006, at approximately 8 p.m., CPD conducted a traffic stop on C. SPARKMAN and THOMPSON. C. SPARKMAN was the driver of the car, and provided officers with her driver's license. During the stop, officers seized \$185 in cash from the two, as earlier in the day (at approximately 12:30 p.m.) a UCO had bought approximately 7.2 grams of crack cocaine from DENTON for \$250 in pre-recorded funds, and officers wanted to see whether any of the pre-recorded funds would be in THOMPSON's possession by that point [they were not]. Minutes later,

at approximately 8:04 p.m. (call#4875), DENTON was intercepted over Target Phone 1 talking to VICTOR THOMPSON. THOMPSON, using CAROLINE SPARKMAN's cellular telephone, told DENTON, "The police robbed us. The fucking police just robbed me." DENTON replied, "Did they, man?" THOMPSON stated affirmatively, "Hmm." DENTON asked, "For everything?" THOMPSON replied, "Yes. Me and mother fucking DINA (CAROLINE SPARKMAN), man." DENTON asked, "What they take, Old Man?" THOMPSON answered, "They take all my mother fucking money, man, and DINA say, 'They took my twenty dollars.'" DENTON stated, "They know who you are?" THOMPSON replied "Yeah. They said, like, 'Thompson...hah'...like 'Machine gun Thompson.' What the fuck. I say, 'You say it right'Damn man, it seems like working hard and it just throw us backward.....Man, I don't like this shit. I don't never like to lose, man." DENTON replied, "No. You got to work twice as hard tomorrow." THOMPSON agreed, "Twice as mother fucker hard."

157. I believe that in this call THOMPSON used CAROLINE SPARKMAN'S phone to call DENTON and tell him that the police stopped him and taken his drug money ("The police robbed us. The fucking police just robbed me"). DENTON then asked THOMPSON if the police took all of the proceeds THOMPSON had on him ("For everything?"). THOMPSON responded that the police took everything, even the twenty dollars belonging to CAROLINE SPARKMAN ("They take all my mother fucking money, man, and DINA say, 'They took my twenty dollars'"). DENTON then asked THOMPSON if the police knew of his background as a gang boss ("They know who you are?"). THOMPSON told DENTON the police knew who he was, and his reputation as a gang boss ("Yeah. They said, like, 'Thompson...hah'...like 'Machine gun Thompson.' What the fuck. I say, 'You say it right'"). THOMPSON then told DENTON that he had been working hard making money by selling drugs, and expressed his frustration at losing his money to the police seizure

(“Damn man, it seems like working hard and it just throw us backward...Man, I don’t like this shit. I don’t never like to lose”). DENTON then told THOMPSON he would have to work twice as hard tomorrow at bringing in profits from selling drugs to make up for the seizure (“No. You got to work twice as hard tomorrow.”).

H. MILLARD MORROW, aka “MILLIE”

158. As outlined in the calls summarized below, MILLARD MORROW sells crack cocaine for the organization. In addition, two controlled purchases of crack cocaine (totaling 0.32 grams) have been made from MORROW by UCOs in this case.²³

159. On June 14, 2006, an undercover Chicago Police Officer purchased 0.16 grams of crack cocaine from MORROW. The officer was wearing a body-recording device during the buy. The tape recording from the buy reveals that when the officer came to the location of roughly 408 W. 116th Street, he asked whether “DARRYL,” meaning DARRYL EDWARDS, or Individual Q was available. MORROW then asked the UCO, “You said you know DARRYL? ... You seen me before?” After the UCO stated that he had seen MORROW before, MORROW delivered 0.16 grams of crack cocaine to the UCO (“There it is”) and instructed the UCO what to do with the money for the crack (“Put it up there.”). The UCO then tendered MORROW \$20 in pre-recorded funds.

160. On October 26, 2006 at approximately 2:43 p.m. (call# 7129), ANDRE SPARKMAN called SHAWN DENTON on Target Phone 1 and asked him, “Is that a green truck.... There’s a green

²³ MILLARD MORROW was identified, among other ways, through the two recorded controlled purchases CPD’s undercover officers made from MORROW on June 14, 2006 and July 13, 2006. Following the June 14, 2006 controlled purchase, the CPD UCO involved in the deal picked MORROW out of a photo spread.

truck sitting out front of the house.” DENTON replied, “I think it’s the white girl ... that day for MILLIE...go look and see if it is. I’ll come back around there.”²⁴

161. I believe that during this call SPARKMAN informed DENTON that a customer in a green truck was at the drug spot in waiting to buy drugs (“Is that a green truck.... There’s a green truck sitting out front of the house”). DENTON told SPARKMAN that MILLARD MORROW had previously sold drugs to the white girl in the green truck, and added that he (DENTON) would come back to make the sale (“I think it’s the white girl ... that day for MILLIE...go look and see if it is. I’ll come back around there.”)

162. On November 7, 2006 at approximately 7:25 p.m. (call# 4704), SHAWN DENTON called Individual B and told her he was outside in his car talking to “MILLIE” (MILLARD MORROW). DENTON then explained that MORROW had told him the police were watching him (DENTON). Individual B asked, “Are you sure he ain’t telling you that to get you off the streets?”

163. I believe that in this call Individual B told DENTON that MORROW may have reported the information to get DENTON off the drug spot, thereby leaving more business for MORROW (“Are you sure he ain’t telling you that to get you off the streets?”).

164. On November 7, 2006 at approximately 8:02 p.m. (call#4716), SHAWN DENTON was intercepted using Target Phone 1 talking to Individual L. Individual L stated, “What do you think? He ain’t going to be on the block no more?” DENTON asked, “Who?” Individual L stated, “MILLIE.” Denton responded, “No. He’s like, ‘Man,’ he say... ‘well they watching. They got me.’”

²⁴ I know that MILLIE is a nickname for MORROW because on June 27, 2006, a CPD UCO had a conversation with DARRYL EDWARDS in which the UCO physically described MILLARD MORROW and explained that he was the person from whom the UCO had last bought crack cocaine at the spot. EDWARDS acknowledged that he knew which seller the UCO was referring to, stating, “MILLIE with the bald head?”

165. I believe that in this call, Individual L asked DENTON if he thought MILLARD MORROW would be back working at the drug spot selling crack cocaine (“What do you think? [MILLIE] ain’t going to be on the block no more?”). DENTON then told Individual L that MORROW believed the police were watching him. (“No ... He’s like, ‘Man,’ he say... ‘they watching. They got me.’”).

VIII. CONCLUSION

166. WHEREFORE, Affiant submits that the foregoing evidence establishes that the above listed defendants conspired and agreed with each other and with others known and unknown to possess with intent to distribute and distribute controlled substances, namely, in excess of 50 grams of cocaine base in the form of “crack” cocaine, in violation of Title 21, United States Code, Section 846, and did aid and abet said conspiracy, in violation of Title 18, United States Code, Section 2.

FURTHER AFFIANT SAYETH NOT.

Fernando Cervantes
Special Agent, Drug Enforcement Administration

SUBSCRIBED AND SWORN TO BEFORE ME THIS 1st of May, 2007.

Honorable Martin C. Ashman
United States Magistrate Judge

1. VICTOR THOMPSON, aka "VIC," "OLD MAN"
2. SHAWN DENTON
3. HERBERT TAYLOR, aka "HERB," "HEARD," "GIGGA MAN"
4. ONDRAY MCKNIGHT, aka "TRICKY," "CASH"
5. DARRYL EDWARDS, aka "TOP FLITE," "FLITE"
6. ANDRE SPARKMAN, aka "DRE"
7. CAROLINE SPARKMAN, aka "DINA"
8. MILLARD MORROW, aka "MILLIE"